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City and County of San Francisco  
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# **GRACE CATHEDRAL CLOSE ALTERATIONS Final Environmental Impact Report**

**91.121E**

Draft EIR Publication Date: July 3, 1992

Draft EIR Public Hearing Date: August 6, 1992

Draft EIR Public Comment Period: July 3 to August 14, 1992

Final EIR Certification Date: February 11, 1993

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City and County of San Francisco  
Department of City Planning

# **GRACE CATHEDRAL CLOSE ALTERATIONS Final Environmental Impact Report**

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Changes from the text of the Draft EIR are indicated by solid dots (●)  
at the beginning of each revised section, paragraph, graphic or table.

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**CERTIFICATION MOTION**

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File No.: 91.121E: Grace  
Cathedral Close Alterations  
Address: 1051 Taylor Street  
Assessor's Block 246, Lot 1

**SAN FRANCISCO**

**CITY PLANNING COMMISSION**

**MOTION NO. 13464**

**ADOPTING FINDINGS RELATED TO THE CERTIFICATION OF A FINAL ENVIRONMENTAL IMPACT  
REPORT FOR PROPOSED ALTERATIONS TO GRACE CATHEDRAL CLOSE, LOCATED ON THE BLOCK  
BOUNDED BY TAYLOR, SACRAMENTO, JONES, AND CALIFORNIA STREETS**

MOVED, That the San Francisco City Planning Commission (hereinafter "Commission") hereby CERTIFIES the Final Environmental Impact Report identified as case file No. 91.121E: Alterations to Grace Cathedral Close, including construction of a new main staircase to the Cathedral, a Chapter House, additions to the Cathedral School for Boys, an underground parking garage, and a courtyard, following demolition of the existing Cathedral House, removal and relocation of about 130 feet of the Crocker Fence, and removal of the existing staircase, adjacent courtyard, and parking lot, (hereinafter "Project") based upon the following findings:

1) The City and County of San Francisco, acting through the Department of City Planning (hereinafter "Department") fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code Section 21000 et seq., hereinafter "CEQA"), the State CEQA Guidelines (Cal. Admin. Code Title 14, Section 15000 et seq., hereinafter "CEQA Guidelines") and Chapter 31 of the San Francisco Administrative Code (hereinafter "Chapter 31").

a. The Department determined that an EIR was required and provided public notice of that determination by publication in a newspaper of general circulation on January 9, 1992.

b. On July 3, 1992, the Department published the Draft Environmental Impact Report (hereinafter "DEIR") and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment and of the date and time of the City Planning Commission public hearing on the DEIR; this notice was mailed to the Department's list of persons requesting such notice.

c. Notices of availability of the DEIR and of the date and time of the public hearing were posted near the project site by Department staff on July 6, 1992.

CITY PLANNING COMMISSION

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d. On July 3, 1992 copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, to adjacent property owners, and to government agencies.

e. Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on July 3, 1992.

2) The Commission held a duly advertised public hearing on said Draft Environmental Impact Report on August 6, 1992 at which opportunity for public comment was given, and public comment was received on the DEIR. The period for acceptance of written comments ended August 14, 1992.

3) The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the 42-day public review period for the DEIR, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR. This material was presented in a "Draft Summary of Comments and Responses," published on January 28, 1993, was distributed to the Commission and to all parties who commented on the DEIR, and was available to others upon request at Department offices.

4) A Final Environmental Impact Report has been prepared by the Department, consisting of the Draft Environmental Impact Report, any consultations and comments received during the review process, any additional information that became available, and the Summary of Comments and Responses all as required by law.

5) Project Environmental Impact Report files have been made available for review by the Commission and the public, and these files are part of the record before the Commission.

6) On February 11, 1993, the Commission reviewed and considered the Final Environmental Impact Report and found that the contents of said report and the procedures through which the Final Environmental Impact Report was prepared, publicized and reviewed comply with the provisions of CEQA, the CEQA Guidelines and Chapter 31.



CITY PLANNING COMMISSION

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7) The City Planning Commission hereby does find that the Final Environmental Impact Report concerning File No. 91.121E: Grace Cathedral Close Alterations is adequate, accurate and objective, and that the Summary of Comments and Responses contains no significant revisions to the Draft Environmental Impact Report, and hereby does CERTIFY THE COMPLETION of said Final Environmental Impact Report in compliance with CEQA and the CEQA Guidelines.

8) The Commission, in certifying the completion of said Final Environmental Impact Report, hereby does find that the project described and evaluated in the main text of the Environmental Impact Report:

Will have a significant effect on Architectural and Historic Resources in that it would remove and relocate 130 feet of the Crocker Fence which is part of designated City Landmark No. 170 and which the State Historic Preservation Officer has determined appears eligible for listing on the National Register of Historic Places; would demolish the Cathedral House, a contributing building to a district that the State Historic Preservation Officer has determined appears eligible for listing on the National Register; and might affect the Cathedral Close's eligibility for listing as a historic district on the National Register.

I hereby certify that the foregoing Motion was ADOPTED by the City Planning Commission at its regular meeting of February 11, 1993.

Linda Avery  
Secretary

AYES: Commissioners Fung, Levine, Lowenberg, Unobskey, and Prowler  
NOES: None  
ABSENT: Commissioners Smith and Boldridge



**GRACE CATHEDRAL CLOSE ALTERATIONS**  
● **FINAL ENVIRONMENTAL IMPACT REPORT**

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## I. SUMMARY

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### A. PROJECT DESCRIPTION

Grace Cathedral Corporation, which is affiliated with the Episcopal Diocese of California, proposes alterations on the Cathedral property as follows: construction of a new staircase from Taylor Street to the main doors of the Cathedral, construction of a new three-story, approximately 19,100-square-foot (sq.-ft.) Chapter House, construction of two separate additions to the Cathedral School for Boys totaling about 11,400 sq. ft. along Sacramento Street, construction of a new landscaped courtyard north of the Cathedral building, construction of a two-level, approximately 48,600-sq.-ft. (about 120-space) subsurface parking garage with access on Taylor Street, and construction of approximately 6,500 sq. ft. of meeting room and gift shop area beneath the proposed new staircase to the Cathedral. Grace Cathedral Corporation also proposes to demolish the existing approximately 14,800 sq. ft. Cathedral House and the existing Cathedral stairs, remove the existing surface parking lot (approximately 65 spaces), and remove approximately 130 linear feet of the approximately 490-foot-long Crocker Fence which partially surrounds the Cathedral property. Approximately 90 linear feet of the removed fence would be relocated to the new courtyard north of Grace Cathedral, and almost all of the remaining 40 linear feet would be relocated to currently unidentified areas of the project site. The Cathedral itself and the existing Diocesan House at the corner of Sacramento and Taylor Streets would remain unchanged. The project would reorient the entrance to the Cathedral property from the corner of California and Taylor Streets onto Taylor Street; add meeting space in the proposed Chapter House along Sacramento Street; and reorient vehicle access to the site from Sacramento Street to Taylor Street. The project architect is William Turnbull Associates of San Francisco.

The project, including the Chapter House, additions to the Cathedral School for Boys, subsurface parking garage, and new under-stair area, would result in a total of about 87,400 sq. ft. of new construction on the project site. Following demolition and construction, the project would result in a net increase of about 66,100 sq. ft. of built area on the site. This net increase in built area would include approximately 11,400 sq. ft. in additions to the Cathedral School for Boys, approximately 48,600 sq. ft. in the proposed subsurface parking garage, approximately 4,300 sq. ft. resulting from the demolition of the Cathedral House and construction of the proposed Chapter House, and approximately 1,800 sq. ft. resulting from reconstruction of the under-stair area. The project would result in a net increase of about 55 parking spaces on the

project site, after removal of the existing 65-space surface parking lot and construction of the proposed 120-space subsurface parking garage.

## B. MAIN ENVIRONMENTAL EFFECTS

### ARCHITECTURAL, HISTORIC AND CULTURAL RESOURCES (PP. 50 TO 53)

The proposed project would include the demolition of the Cathedral House which stands between Taylor Street and the main facade of the Cathedral proper, demolition of the existing Cathedral stairs, removal and relocation of portions of the Crocker Fence which partially surrounds the Cathedral property, and other physical changes within the Cathedral Close. The entirety of the Cathedral Close (Grace Cathedral and the area around it), excluding the Cathedral House and the

- existing parking lot, is designated City Landmark No. 170. The State Historic Preservation Officer (SHPO) has determined that the Close appears eligible for listing on the National Register of Historic Places as a historic district.

- The Crocker Fence is included in City Landmark No. 170 and, according to the SHPO, contributes to the significance of a historic district (which appears eligible for the National Register) and appears individually eligible for the Register. The fence was constructed circa 1877 and is the sole remaining architectural element associated with the Crocker Mansion, which formerly occupied the project site. To accommodate the proposed new staircase to the main Cathedral entrance and the entrance to the subsurface parking garage, approximately 130 linear feet of the Crocker Fence would be removed from the Taylor Street frontage of the site. (About 220 linear feet of the fence currently exist along the Taylor Street frontage, and about 270 linear feet exist along the Sacramento Street frontage.) Approximately 90 linear feet of the removed fence would be relocated to the interior of the site north of the Cathedral, at the south side of the proposed landscaped courtyard. The remainder of the removed fence would consist of individual
- segments of relatively short lengths totaling about 40 linear feet, or less; almost all of this portion of the removed fence would be relocated to currently unidentified areas of the project site. While a portion of the removed fence would be relocated to the proposed courtyard, relocation of the fence to that area would not preserve the fence in its original location as a marker of the Crocker Mansion and the street. Because the Crocker Fence is included in the Grace Cathedral Close
- City Landmark No. 170, and, according to the SHPO, contributes to the significance of a historic district (which appears eligible for the National Register) and appears individually eligible for the Register, and because the fence's character depends on its location as a marker of the original

Crocker Mansion, removal of the 130-foot-long segment, as proposed, would significantly impact this Landmark.

- The Cathedral House is not included in City Landmark No. 170, but the SHPO has determined that it is a contributing structure within a district that appears eligible for the National Register. The Cathedral House was also included in the secondary survey area as described in *Splendid Survivors*, p. 227. The Foundation for San Francisco's Architectural Heritage has not surveyed the crest of Nob Hill, or assigned ratings to buildings in that secondary survey area. The Foundation for San Francisco's Architectural Heritage has not completed ratings for buildings in this survey area. The Cathedral House, completed in 1912, was sited consistent



with the 1907 George Bodley plan for the cathedral property that would have placed the main cathedral facade on California Street. Revised plans for the cathedral property, which changed the position of the cathedral to face Taylor Street, were completed by San Francisco architect Lewis Hobart in 1926. Construction of the cathedral building facing Taylor Street commenced in 1928. The Cathedral House partially blocks off the eastern approach to the main cathedral entrance. Demolition of the Cathedral House and removal of a portion of the Crocker Fence along Taylor Street, as proposed in the project, would be necessary in order to construct the proposed new stairway leading from Taylor Street to the Cathedral's main entrance. Because the SHPO has determined that the Cathedral House contributes to the significance of a district which appears eligible for the National Register, demolition of the Cathedral House would significantly impact this historic resource. Removal of the fence and demolition of the Cathedral House, along with other changes to the Close, might affect the eligibility of the Close for listing in the National Register.

The proposed project would include excavation to a depth of approximately 30 feet for the subsurface parking garage. Archaeological resources including previously unrecorded prehistoric resources and historic resources from the Gold Rush and later nineteenth century periods may be encountered on the project site during construction activities. Some subsurface resources associated with the Crocker Mansion may also be encountered.

#### URBAN DESIGN (pp. 53 to 54)

The proposed three-story Chapter House, flanking Sacramento Street, would be designed in a Gothic style similar to the style of the existing Diocesan House, which would remain on the site. The Chapter House would have walls of cast-in-place concrete and a slate tile roof in a color similar to the slate tile roof of the Diocesan House. The additions to the Cathedral School for Boys would be designed in the same architectural style as the proposed Chapter House, would also have walls of cast-in-place concrete, and would have a slate tile roof in a similar color to that of the Diocesan House.

The project would remove the existing stairs to the Cathedral, the Cathedral House, and the courtyard between the Cathedral House and the Cathedral proper. As a result, the complete front facade of Grace Cathedral would be visible along Taylor Street and from Huntington Park across Taylor Street from the site. The Chapter House and Diocesan House along Sacramento Street would form a foreground for the Cathedral in views from the north, and the existing surface parking lot on the site would be eliminated. The existing open area between the Cathedral House

and the Cathedral would be replaced by a landscaped courtyard north of the Cathedral, where the existing surface parking lot is located.

#### SHADOW (pp. 54 to 66)

Proposed new construction and demolition would affect shading of Huntington Park, across Taylor Street from the Grace Cathedral property. The proposed Chapter House and eastern school addition would each result in new shading of northeastern and central portions of Huntington Park in late afternoon from March through October. Demolition of the Cathedral House would result in a decrease in shadow in the central and southern portions of Huntington Park in the late afternoon through much of the year. The project also would result in changes to shadows affecting surrounding streets, sidewalks, and buildings in the immediate vicinity. Approximate maximum shading of Huntington Park by project buildings would occur on April 20 at 6:50 p.m. At that time, about the same extent of shadow on the park, about 85 percent, would occur with the proposed project as under existing conditions.

Neither the proposed Chapter House nor the school addition would exceed 40 feet in height, as measured under the *City Planning Code*. Therefore, neither would be subject to Proposition K, the Sunlight Ordinance (*City Planning Code* Section 295), which restricts new shadows on certain properties under the jurisdiction of the Recreation and Park Commission.

#### TRANSPORTATION (pp. 67 to 79)

Currently, on weekdays, there are approximately 150 employees/volunteers, an average of 80 to 100 visitors, and 200 students on the Grace Cathedral site, for a total of about 450 people on the site over the course of a typical weekday. The estimated vehicle trip generation associated with community functions at the Cathedral on a typical Tuesday evening, the most heavily attended meeting night (about 500 attendees), is about 486 vehicle trips (vte) between the hours of 6:30 p.m. and 10:00 p.m.; 243 vte to the Cathedral and 243 vte from the Cathedral. The Cathedral also generates travel demand from staff and students associated with daytime uses.

The proposed project would increase the number of employees working on the project site by approximately five, which would include two new school employees and one to three parking garage attendants. The project would increase the capacity of meeting space available to community groups, but would not be expected to increase the maximum number of evening



function attendees over existing conditions. An estimated additional 36 students would attend the School for Boys.

Travel demand generated by up to five new employees and 36 new students would not cause a noticeable increase in traffic. If all of the new employees were to drive alone to and from work, and approximately 50 percent of the new students would be dropped off by car, with approximately two students per vehicle, it is estimated that the project would add a maximum of approximately 20 vehicle trips during the a.m. peak hour, and two vehicle trips during the p.m. peak hour, to streets in the vicinity of the Cathedral. Because the estimated vehicle trips during the p.m. peak period would be low, it would be expected that the new trips would not be noticeable within daily fluctuations in traffic. No substantial increase in trips would be expected to be generated by evening meeting attendees since no substantial increase in the number of meeting attendees would be expected with the project. Also, any additional trips generated by the project in the evening would occur outside of traffic peak periods.

The project would move parking access to the Cathedral site from Sacramento Street, a one-way transit preferential street, to a garage entrance on Taylor Street, a two-way local street on which MUNI buses and cable cars do not operate. The existing lot has a one-lane driveway which is shared by both entering and exiting vehicles, which at times could affect the flow of traffic (including MUNI) on Sacramento Street. The proposed entrance to the new parking garage would have two lanes, one for entering and one for exiting vehicles. Relocating the parking lot entrance to Taylor Street would eliminate the potential impacts of the Cathedral's existing parking lot on Sacramento Street. The proposed two-lane driveway on Taylor Street would not be expected to result in conflicts between entering and exiting vehicles and traffic on this less traveled street.

Grace Cathedral currently provides 65 off-street parking spaces in its on-site surface parking lot. The project would replace this lot with a 120-space parking garage, thereby increasing the Cathedral's off-street parking supply by 55 spaces. On-street parking occupancy for a Tuesday evening, the peak meeting time, is currently about 101 percent. On the same evening, the Grace Cathedral off-street parking lot is about 109 percent occupied. Currently, on-street parking occupancy for Sunday mornings is about 99 percent, and on-site parking occupancy is 100 percent occupied.

It is estimated that Cathedral activities on a typical Tuesday evening generate a parking demand for about 243 parking spaces, with an on-street demand of about 122 parking spaces and the

remaining parking demand for about 121 spaces being accommodated in the Cathedral's 65-space off-street parking lot or other nearby off-street parking lots. The Cathedral also generates parking demand from staff associated with daytime uses.

As noted above, the proposed project would increase the number of employees working at the project site by approximately five employees, would not be expected to increase the maximum number of function attendees to the site above current peak levels, and would increase school enrollment by about 36 students. The proposed project therefore would not be expected to substantially increase the number of people who would drive to and park at the facilities (new students would not drive to the school and park), and there would not be a noticeable increase in demand on the parking supply in the vicinity of the Cathedral. In addition, although not needed to accommodate increased parking demand for the proposed project, the project proposes to increase the number of on-site parking spaces as required by the *City Planning Code*. The approximately 55 additional spaces could reduce existing effects of Cathedral activities on existing parking conditions in the project vicinity.

The proposed project would not change any of the existing passenger loading zones in the vicinity of Grace Cathedral. The increase in the number of students at the School for Boys would not be expected to affect loading zone activity, and thus would not be expected to change traffic patterns in the area.

Changes in vehicle and pedestrian access to the site and to Cathedral buildings would alter overall pedestrian conditions at the project site and could warrant the installation of devices to warn pedestrians of approaching vehicles at the proposed garage entrance. The Cathedral would install appropriate pedestrian warning devices at the driveway to the proposed subsurface parking garage.

#### GROWTH INDUCEMENT (pp. 79-80)

The project would result in some intensification of existing land uses at the project site. The additions to the Cathedral School for Boys could allow enrollment at the school to increase by a maximum of about 36 students, and the existing school staff to increase by a maximum of two staff members. The project could result in the addition of one to three new staff members to supervise the proposed parking garage. The proposed expansion and addition of three net new meeting spaces (one in the Cathedral House and two in the under-stair area) would result in an increase in meeting capacity of about 500 persons. Provision of additional capacity would not in

itself increase use of the site, and any future demand would be distributed among various meeting spaces which would not be expected to be fully occupied at the same time.

The project would be built in a developed urban area, and no expansion to the municipal infrastructure not already under consideration would be required to accommodate new development due to, or induced by, the project.

### **C. MITIGATION MEASURES**

Some of the measures identified that would mitigate potentially significant environmental effects are presented below. A full recitation of mitigation measures proposed as part of the project or proposed for consideration are presented on pp. 81-84.

#### **MEASURES PROPOSED AS PART OF THE PROJECT**

##### **Cultural Resources**

- Given the possibility of encountering archaeological resources within the project site, the sponsor would retain the services of an archaeologist. The archaeologist would supervise a program of archaeological testing prior to the commencement of excavation/construction of the proposed project. The testing program would use a series of mechanical, exploratory trenches, borings, and/or other similar on-site testing methods to help further define the probability of encountering significant archaeological resources during excavation and construction.

If the archaeologist determined on the basis of this testing program that no additional measures were required to safeguard potentially significant archaeological resources, he/she would submit a written report to the Environmental Review Officer (ERO), with a copy to the project sponsor, describing the testing program and his/her conclusions.

Should the archaeologist determine on the basis of the testing program that additional measures were required, he/she would consult with the ERO to determine further actions appropriate to mitigate potential adverse impacts to significant archaeological resources. These additional actions would be implemented by the project sponsor, and could include, but might not be limited to, monitoring of all site excavation by a qualified historical archaeologist. Mitigation might also require the archaeologist to instruct all excavation and foundation crews on the project site of the potential for discovery of cultural or historic remains, and the procedures to be followed if such remains are uncovered.

Should a monitoring program be required, the project sponsor would designate one individual on site as his/her representative. This representative would have the authority to suspend work at the site to give the archaeologist time to investigate and evaluate archaeological resources should they be encountered. During the monitoring program, the archaeologist would record observations in a permanent log, and the monitoring program,



whether or not there are finds of significance, would result in a written report to be submitted to the ERO, with a copy to the project sponsor.

Should evidence of cultural resources be found during testing or following commencement of excavation activities, the project sponsor would suspend all activities at the project site which the archaeologist and the ERO, in consultation with the President of the Landmarks Preservation Advisory Board (LPAB), jointly determined could damage such resources, and would implement an appropriate security program to prevent looting or destruction. Upon receiving the advise of the archaeologist, the ERO would then recommend specific mitigation measures, if necessary. These additional measures might include additional on-site investigations by the archaeologist, and/or documentation, preservation, and recovery of cultural material. Ground disturbing activities which might damage discovered archaeological resources would be suspended for a maximum of four weeks (cumulatively for all instances where the ERO requires a delay) to permit inspection, recommendation, and retrieval, as appropriate.

Finally, the archaeologist would prepare a report documenting the cultural resources that were discovered, an evaluation as to their significance, and a description of how any archaeological testing, exploration, and/or recovery program was conducted.

Copies of all reports prepared according to this mitigation measure would be sent first and directly to the ERO for review. Following approval by the ERO, copies of the final report would be sent to the President of the Landmarks Advisory Board and the California Archaeological Site Survey Northwest Information Center. The Office of Environmental Review shall receive three copies of the final archaeological report.

### Air Quality

- The project sponsor would require the contractor(s) to sprinkle the site with water during demolition, excavation, and construction activities; sprinkle unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soils, sand or other such material; and sweep surrounding streets during demolition and excavation, as needed, and during construction at least once per day to reduce particulate emissions. The project sponsor would require that the contractor(s) obtain reclaimed water from the Clean Water Program for this purpose. The project sponsors would require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

### Transportation

- During the construction period, the project sponsor would cause to limit construction truck movement to the hours between 9:00 a.m. and 3:30 p.m., and to prohibit staging or unloading of equipment and materials during the periods of 7:30 a.m. to 9:00 a.m. and 3:30 p.m. to 6:00 p.m., to minimize peak-period traffic conflicts.

- The placement of paving, landscaping or structures in the sidewalk area (subject to City approval) would be done in such a way as to minimize interference with pedestrian traffic.

#### MEASURES UNDER CONSIDERATION BY THE PROJECT SPONSOR

##### ● Architectural and Historic Resources

- The project sponsor could prepare historic documentation, to Historic American Buildings Survey (HABS) recordation standards, of the Cathedral House and portion of the Crocker Fence to be removed. HABS, which is administered by the National Park Service, is a process involving preparation of written historic and photographic records of a structure to be altered.

##### Transportation

- The project would include appropriate warning devices to alert pedestrians to vehicles exiting the proposed parking structure during peak times of use.

#### **D. ALTERNATIVES TO THE PROPOSED PROJECT**

##### ALTERNATIVE A: NO PROJECT

This alternative would entail no change to the site. The proposed project would not be built. The existing Cathedral House would not be demolished, and the proposed Chapter House would not be constructed. The additions to the Cathedral School for Boys would not be built, and the existing surface parking lot on the site would be retained. The existing stairs to the Cathedral would not be replaced by the proposed new staircase. New meeting rooms, parking, and open space would not be created on the site. The 130-foot portion of the Crocker Fence along Taylor Street that would be removed with the project would remain in its present location. If the No



Project Alternative were implemented, none of the impacts associated with the project would occur. This alternative would preserve the option to develop a similar or different type of project on the site in the future.

## ALTERNATIVE B: RETENTION OF SITE STRUCTURES

### B.1: Crocker Fence Retention In Place

This alternative would have all of the characteristics of the proposed project, except that the 130-foot portion of the Crocker Fence along Taylor Street that would be removed with the project would remain in its present location. As with the proposed project, the Cathedral House and the existing surface parking lot would be removed and the proposed Chapter House, subsurface parking garage, and additions to the Cathedral School for Boys would be constructed.

Because the 130-foot portion of the Crocker Fence along Taylor Street would not be removed and relocated, the proposed new staircase leading from Taylor Street to the main entrance of the Cathedral would be redesigned, and the entrance to the proposed subsurface parking garage would be relocated to accommodate the fence in its current location. The proposed new staircase could be built with the fence in front of its northern portion along Taylor Street, or the staircase could be redesigned to be narrower, extending from the corner of Taylor and California Streets to the beginning of the Crocker Fence on Taylor Street. In either case, primary access to the Cathedral would not be expanded along Taylor Street and would be limited to the vicinity of the Taylor and California Streets corner. Access to the subsurface parking garage, which would be from Taylor Street with the project, would be from Sacramento Street with this alternative, similar to existing access to the surface parking lot on the site.

This alternative would be similar to the project, with the exception that a portion of the Crocker Fence would not be removed, and parking access would be on Sacramento Street. The total land uses on the site with this alternative would be the same as with the proposed project. Traffic impacts on local streets and intersections would be different because the entrance to the new parking garage would be on Sacramento Street instead of on Taylor Street; access to the Cathedral's garage would occur on Sacramento Street, a transit preferential street, instead of on Taylor Street, a local street, and could therefore have a greater impact on MUNI operations. Because new building construction would be similar to that of the project, effects on shadows and subsurface cultural resources would be similar to those of the project. The fence-portion of City Landmark No. 170 would not be altered. Other impacts of this alternative would be similar

- to those of the proposed project. As with the project, the Cathedral House, which the SHPO has determined is a contributing structure within a historic district which appears eligible for the National Register and is rated "3" in the Department of City Planning Architectural Inventory and identified in the *Here Today* survey, would be demolished with this alternative.

#### B.2: Retention Of Cathedral House And Crocker Fence

With this alternative, the 130-foot portion of the Crocker Fence along Taylor Street that would be removed with the project would remain in its present location, the Cathedral House that would be removed with the project would be retained on the site, and the proposed Chapter House would not be built. As with the proposed project, the existing surface parking lot would be removed from the site, and the proposed subsurface parking garage and additions to the Cathedral School for Boys would be constructed.

Because the 130-foot portion of the Crocker Fence along Taylor Street would not be removed and relocated, and the Cathedral House would not be removed, the proposed new staircase leading from Taylor Street to the main entrance of the Cathedral would not be constructed, and the entrance to the proposed subsurface parking garage would be relocated to accommodate the fence and Cathedral House in their current locations. Primary access to the Cathedral would not be expanded along Taylor Street and would be limited to the vicinity of the Taylor and California Streets corner. Access to the subsurface parking garage, which would be from Taylor Street with the project, would be from Sacramento Street with this alternative, similar to existing access to the surface parking lot on the site.

- The total land uses on the site with this alternative would be similar to those of the proposed project. Traffic impacts on local streets and intersections would be different because the entrance to the new parking garage would be on Sacramento Street instead of on Taylor Street; access to the Cathedral's garage would occur on Sacramento Street, a transit preferential street, instead of on Taylor Street, a local street, and could therefore have a greater impact on MUNI operations. Because new building construction would be limited to the subsurface parking garage and the additions to the Cathedral School for Boys, shadow effects would be less than with the project and similar to the effects described for the school additions only. Shadow from the existing Cathedral House would still occur with this alternative. The fence-portion of City Landmark No.
- 170 would not be altered and the Cathedral House, which the SHPO has determined is a contributing structure within a district which appears eligible for the National Register, would be retained on the site in this alternative. Other impacts of this alternative would be similar to those of the proposed project.

## C. ALTERNATIVE C: RELOCATION OF REMOVED FENCE TO SITE PERIMETER

This alternative would have all of the characteristics of the proposed project, except that the 130-foot portion of the Crocker Fence along Taylor Street that would be removed with the project and relocated in part to the proposed courtyard at the interior of the site would be relocated in its entirety to another location along the perimeter of the site. As with the proposed project, the Cathedral House and the existing surface parking lot would be removed from the site and the proposed Chapter House, subsurface parking garage, meeting rooms, open space, and additions to the Cathedral School for Boys would be constructed.

Impacts of this alternative would be similar to those of the proposed project, except for removal of the fence. The total land uses on the site with this alternative would be the same as with the proposed project. Traffic effects on local intersections would be the same as with the project. Because new building construction would be the same as with the project, effects on shadow and subsurface cultural resources would be the same as with the project. As with the project, the

- Cathedral House, which the SHPO has determined contributes to a district which appears eligible for the National Register and is rated "3" in the 1976 Department of City Planning Architectural Inventory and included in the *Here Today* survey, would be demolished in this alternative, and City Landmark No. 170 (of which the Crocker Fence is a part) would be altered. This alternative would remove a portion of the Crocker Fence from its location along Taylor Street, as with the project; however, this alternative would maintain the fence at the site perimeter rather than the interior of the block. Some alterations to the fence would be required to accommodate its new location on the site perimeter.



## II. PROJECT DESCRIPTION

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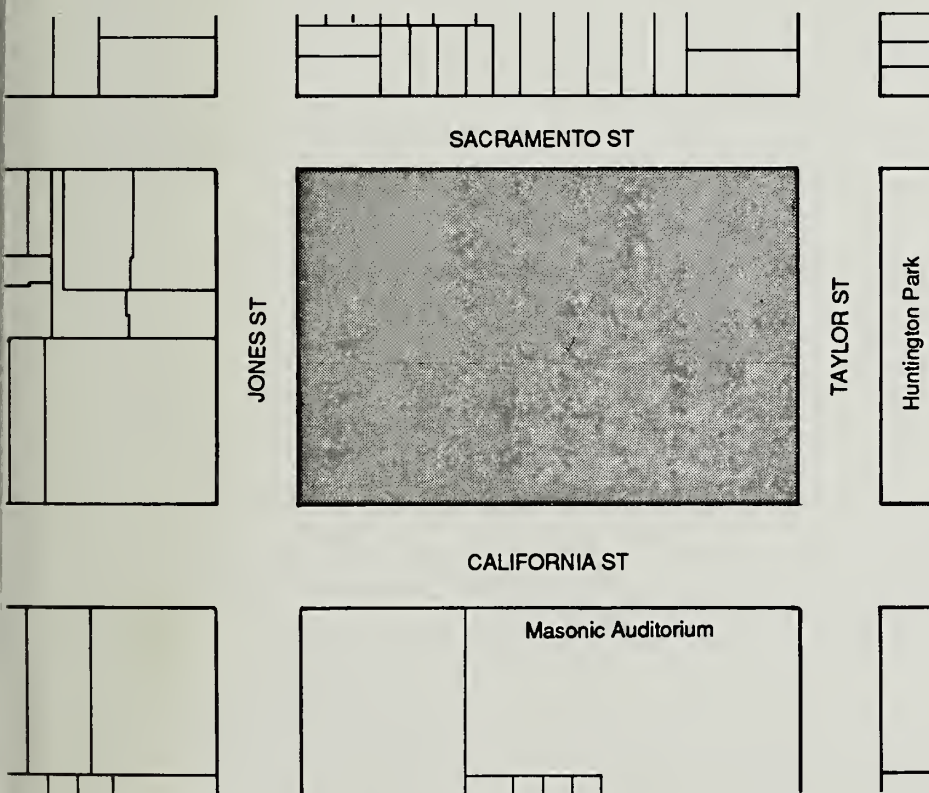
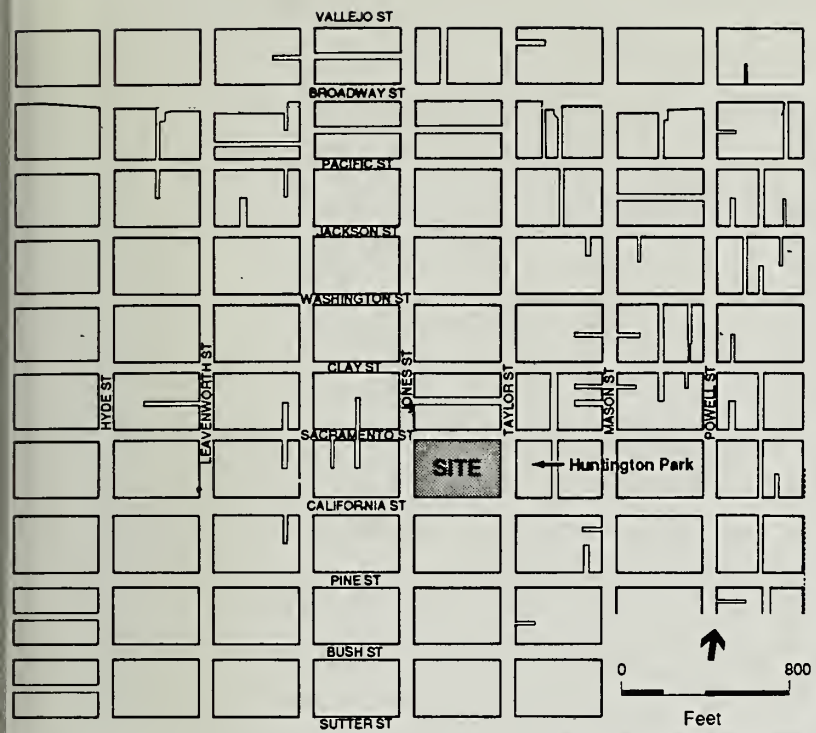
### A. PROJECT SPONSOR'S OBJECTIVES

Grace Cathedral Corporation, which is affiliated with the Episcopal Diocese of California, proposes to construct a new staircase to the main doors of Grace Cathedral, a new three-story Chapter House, two separate additions to the Cathedral School for Boys, a two-level, subsurface parking garage, and meeting rooms beneath the proposed new staircase to the Cathedral. The project would require demolition of the existing Cathedral House and Cathedral stairs. As part of the project, Grace Cathedral Corporation proposes to remove portions of the Crocker Fence which partially surrounds the property, and relocate almost all of the removed fence to other locations on the project site./a/ The project architect is William Turnbull Associates of San Francisco.

The project sponsor's objectives are to provide improved office and meeting space for the Cathedral staff, Cathedral congregation and community groups; to provide additional space for the staff and students of the Cathedral School for Boys; and to complete the 1926 Hobart architectural plan for the Cathedral site. Construction of a new stairway leading to the main Cathedral entrance, which is currently partly obscured by the existing Cathedral House, is intended to provide improved access to the Cathedral and to allow greater visual appreciation of the Cathedral facade and main doors, which are casts from the molds of the Ghiberti "Gates of Paradise" doors in Florence, Italy.

### B. PROJECT LOCATION

The project site includes the full block bounded by California, Sacramento, Jones and Taylor Streets, at the summit of Nob Hill in San Francisco (see Figure 1). The 113,440-square-foot (sq.-ft.) site is Lot 1 of Assessor's Block 246 and currently contains Grace Cathedral (on the southern portion of the site), the Cathedral School for Boys (on the northwest corner of the site), the Diocesan House (on the northeast corner of the site), the Cathedral House (on the east side of the site), the existing Cathedral staircase, and a 65-space surface parking lot which is entered from Sacramento Street west of the Diocesan House. Portions of the northern and eastern boundaries of the site are fenced by the original masonry and iron fence and gate of the Crocker Mansion that was located on the site until the 1906 earthquake and fire. The project site contains a



#### LEGEND



**PROJECT SITE**  
Assessor's Block 246,  
Lot 1



SOURCE: Environmental Science Associates, Inc.

Grace Cathedral ■

**Figure 1**  
Project Location



paved open space area to the east of the Cathedral, between the Cathedral and the Cathedral House. Huntington Park is across Taylor Street, east of the project site. The site is within an RM-4 (Residential Mixed, High Density) Use District and a 65-A Height and Bulk District.

### C. PROJECT CHARACTERISTICS

The proposed Grace Cathedral Close Alterations project would include construction of a new staircase from Taylor Street to the main doors of the Cathedral with meeting rooms below, a new Chapter House, two separate additions to the Cathedral School for Boys, and a subsurface parking garage. The existing Cathedral House and Cathedral stairs would be demolished, the existing parking lot and paved open area east of the Cathedral would be removed, and approximately 130 linear feet of the Crocker Fence would be removed from the Taylor Street frontage of the site in order to accommodate new construction. Approximately 90 linear feet of the removed fence would be relocated to a new landscaped courtyard north of Grace Cathedral, and almost all of the remaining 40 linear feet would be relocated to currently unidentified areas of the project site./a/ The new landscaped courtyard would be constructed above the parking garage to the north of the Cathedral, in the area of the existing parking lot. It is not anticipated that the courtyard area would be used for parking except for an occasional hearse at a funeral or a limousine at a wedding. The area would not be generally used for loading, except for an unusual circumstance such as a band unloading equipment for a concert./1/ The Cathedral itself and the existing Diocesan House would remain unchanged. Project characteristics are summarized in Table 1. The existing site plan is shown in Figure 2 on p. 17. Proposed floor plans and elevations are shown in Figures 3 through 7, on pp.18 to 22.

The proposed Chapter House would be a three-story building located on the northern portion of the site, along Sacramento Street. The Chapter House would be approximately 40 by 175 feet in plan, and would contain public rooms on the ground floor with offices and three residential units above for a total of about 19,100 sq. ft. The residential units would not be rented; they would be occupied by guests of the Cathedral and Cathedral employees. The three-story Chapter House would not exceed 40 feet in height, measured per the *City Planning Code*.

The two additions to the existing 17,100-sq.-ft. Cathedral School for Boys would include (1) a four-story, approximately 11,100-sq.-ft. addition (about 30 by 90 feet in plan) located on the east side of the School, perpendicular to Sacramento Street, with seven classrooms and one administrative office; and (2), a one-story, approximately 300-sq.-ft addition located at ground level on the north side of the building, which would increase the area of the School's library. The Cathedral School for Boys would increase by approximately 11,400 sq. ft., to a total

TABLE 1: PROJECT CHARACTERISTICS

<u>Proposed Uses</u>	<u>Chapter House</u> (to replace existing 14,800-sq.-ft. Cathedral House)	<u>Cathedral School</u> (17,100 sq. ft. existing)	<u>Under-stair Area</u> (to replace existing 6,500-sq.-ft. under-stair area)	<u>Parking Garage</u> (to replace existing 22,600-sq.-ft., 65-space surface parking lot)	<u>TOTAL</u>
Office Use	9,800 sq. ft. /c/	2,500 sq. ft. /c/			-12,300 sq. ft.
Meeting Rooms	6,200 sq. ft. /a/		4,000 sq. ft.		10,200 sq. ft.
Residential Use	3,100 sq. ft. /b/				3,100 sq. ft.
Classroom		8,600 sq. ft. /c/			8,600 sq. ft.
Library		300 sq. ft. /d/			300 sq. ft.
Other			4,300 sq. ft. /e/		4,300 sq. ft.
Parking				48,600 sq. ft. (about 120 spaces)	48,600 sq. ft.
Total New Construction	19,100 sq. ft.	11,400 sq. ft.	8,300 sq. ft.	48,600 sq. ft.	87,400 sq. ft.
Existing Construction to be Removed	14,800 sq. ft.		6,500 sq. ft.		
Net New Construction	4,300 sq. ft.	11,400 sq. ft.	1,800 sq. ft.	48,600 sq. ft.	66,100 sq. ft.
Maximum Height	40 feet /f/	40 feet /f/			
Size of Site					113,440 sq. ft.
Open Space					17,200 sq. ft. /g/

/a/ Including Library and Dining Room in the Chapter House.

/b/ Three dwelling units. Dwelling units would be occupied by guests of the Cathedral and Cathedral employees; they would not be rented.

/c/ Located in east school addition.

/d/ Located in north school addition.

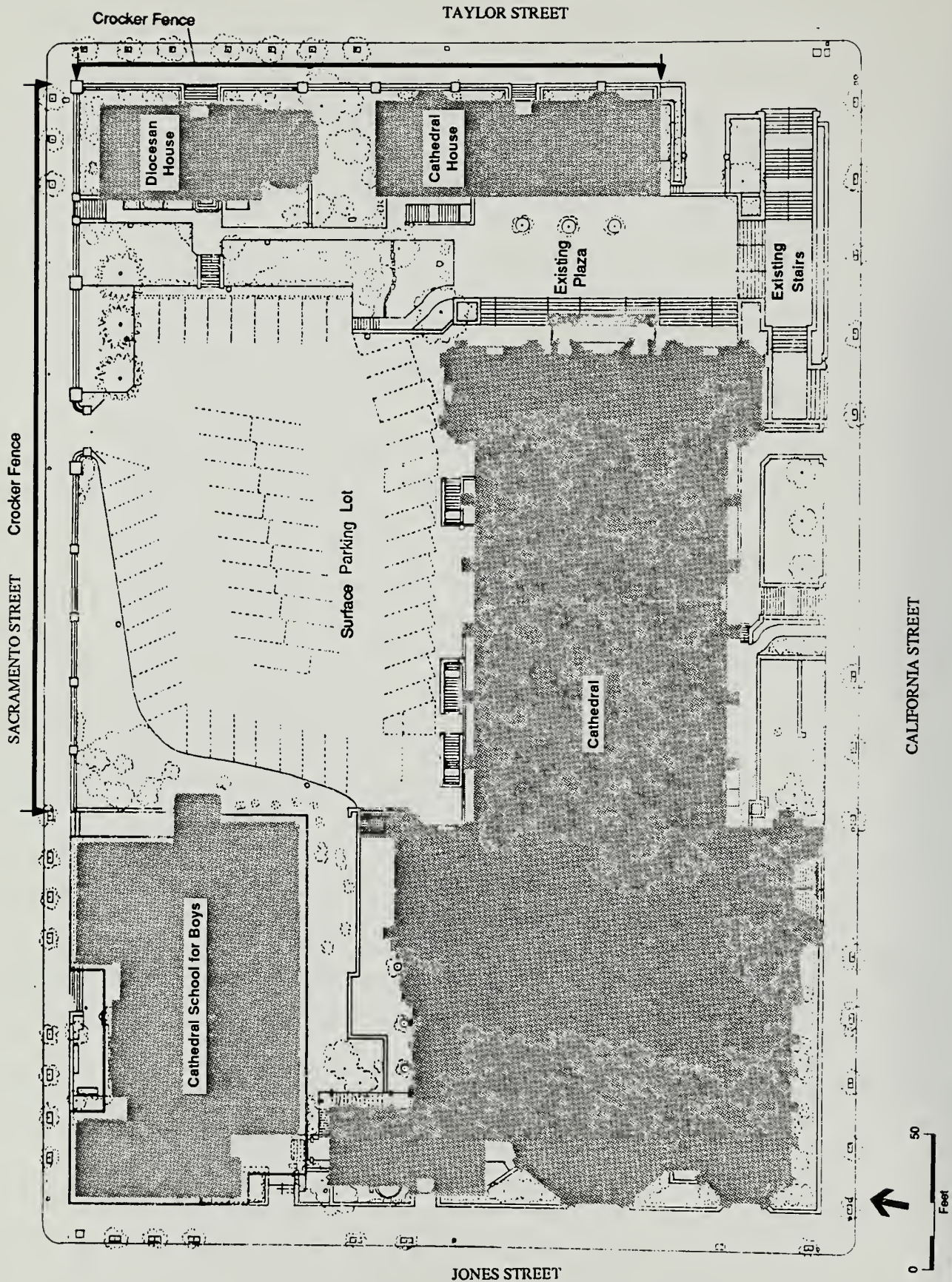
/e/ Gift shop and storage.

/f/ As measured under the *City Planning Code*.

/g/ Proposed 13,400 sq. ft. courtyard between the Cathedral and the proposed Chapter House, and 4,200 sq. ft. in front of the Cathedral entrance. These features would replace 3,500 sq. ft. of existing open space between the Cathedral and the existing Cathedral House.

SOURCE: William Turnbull Associates; Environmental Science Associates.





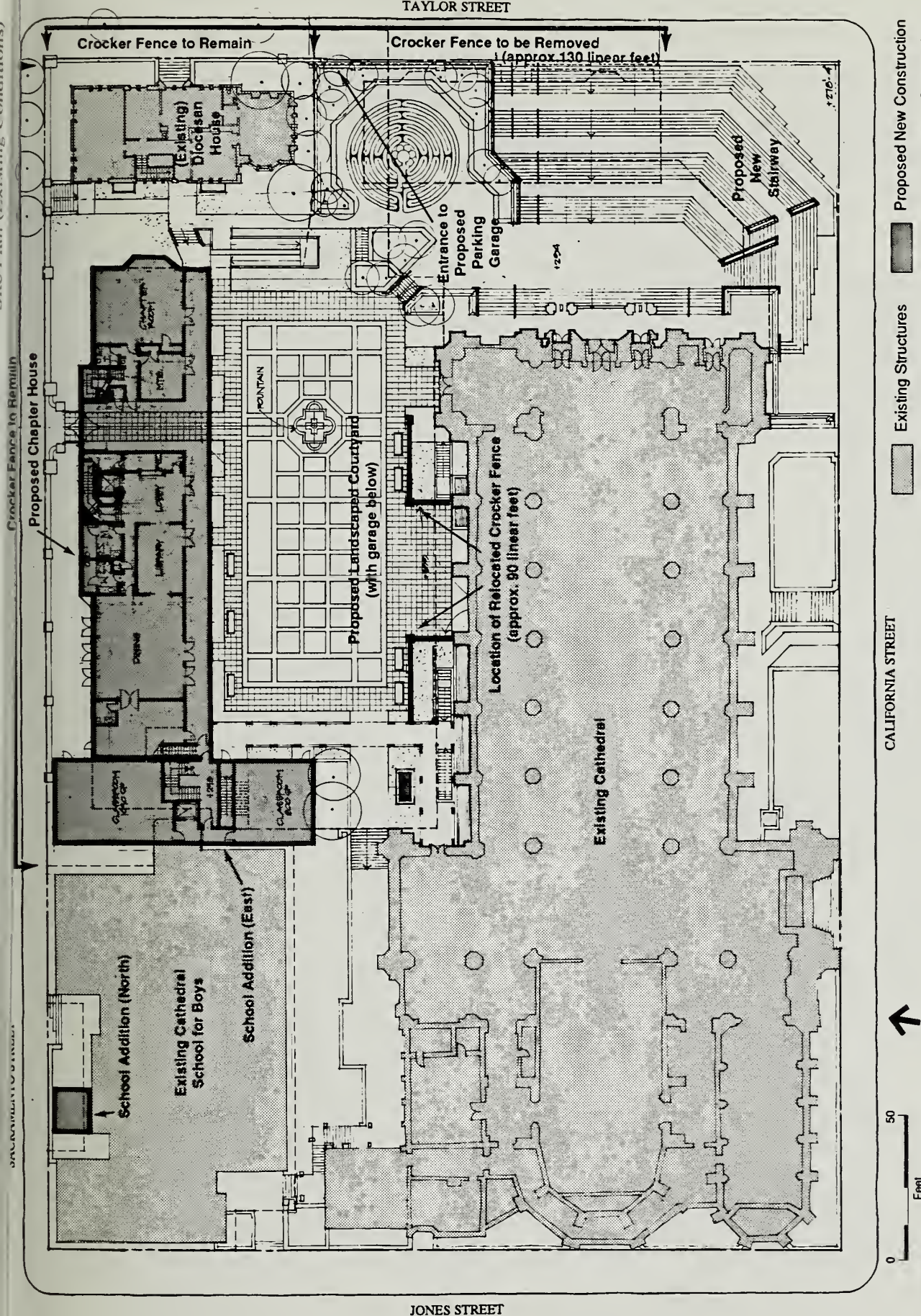
SOURCE: William Turnbull Associates

Grace Cathedral

Figure 2

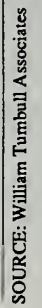
Site Plan (Existing Conditions)





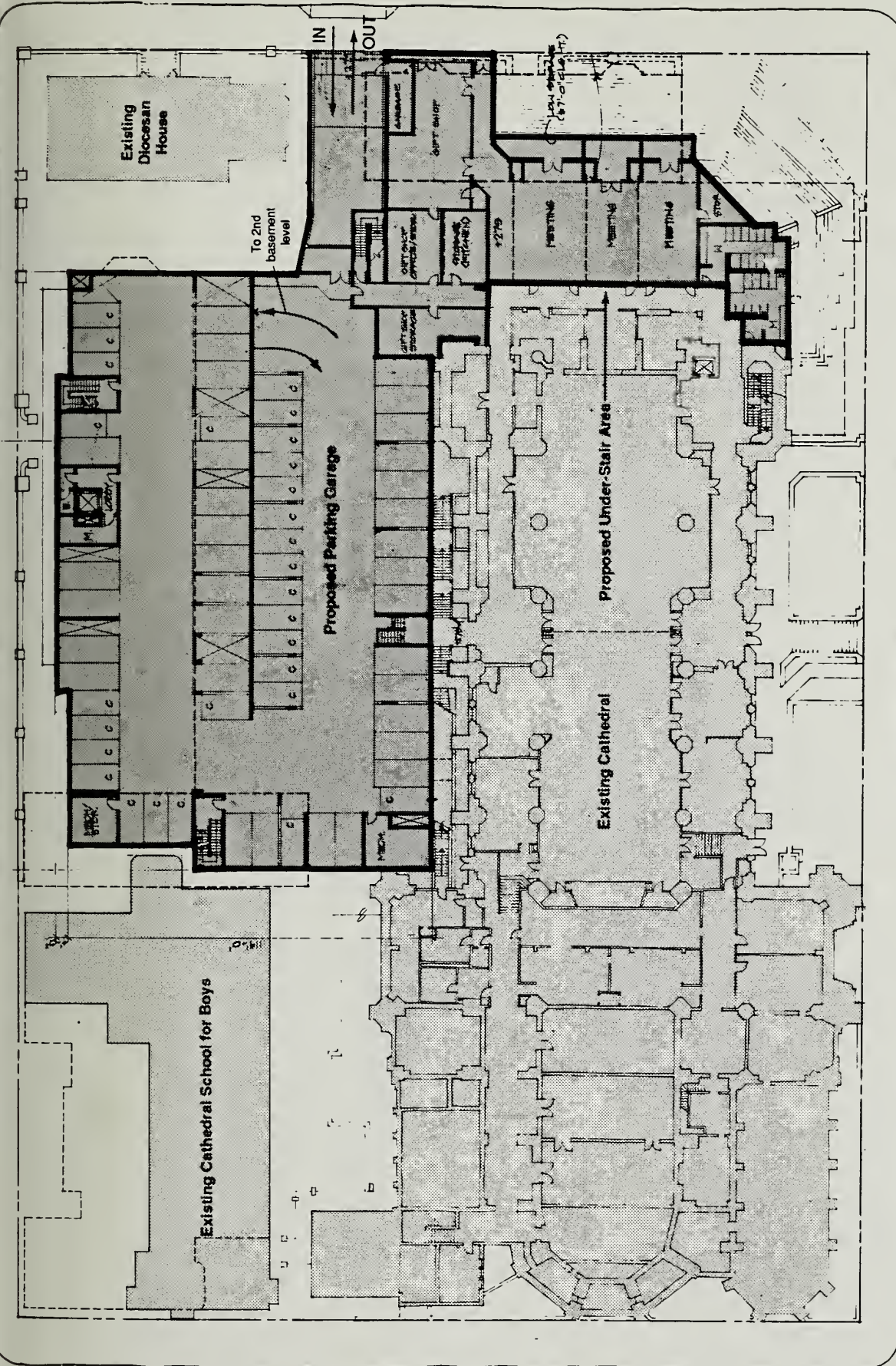
**Figure 3**  
Ground Level Floor Plan





### Figure 4 Second Level Floor Plan





0 50 Feet

↑

CALIFORNIA STREET

Existing Structures

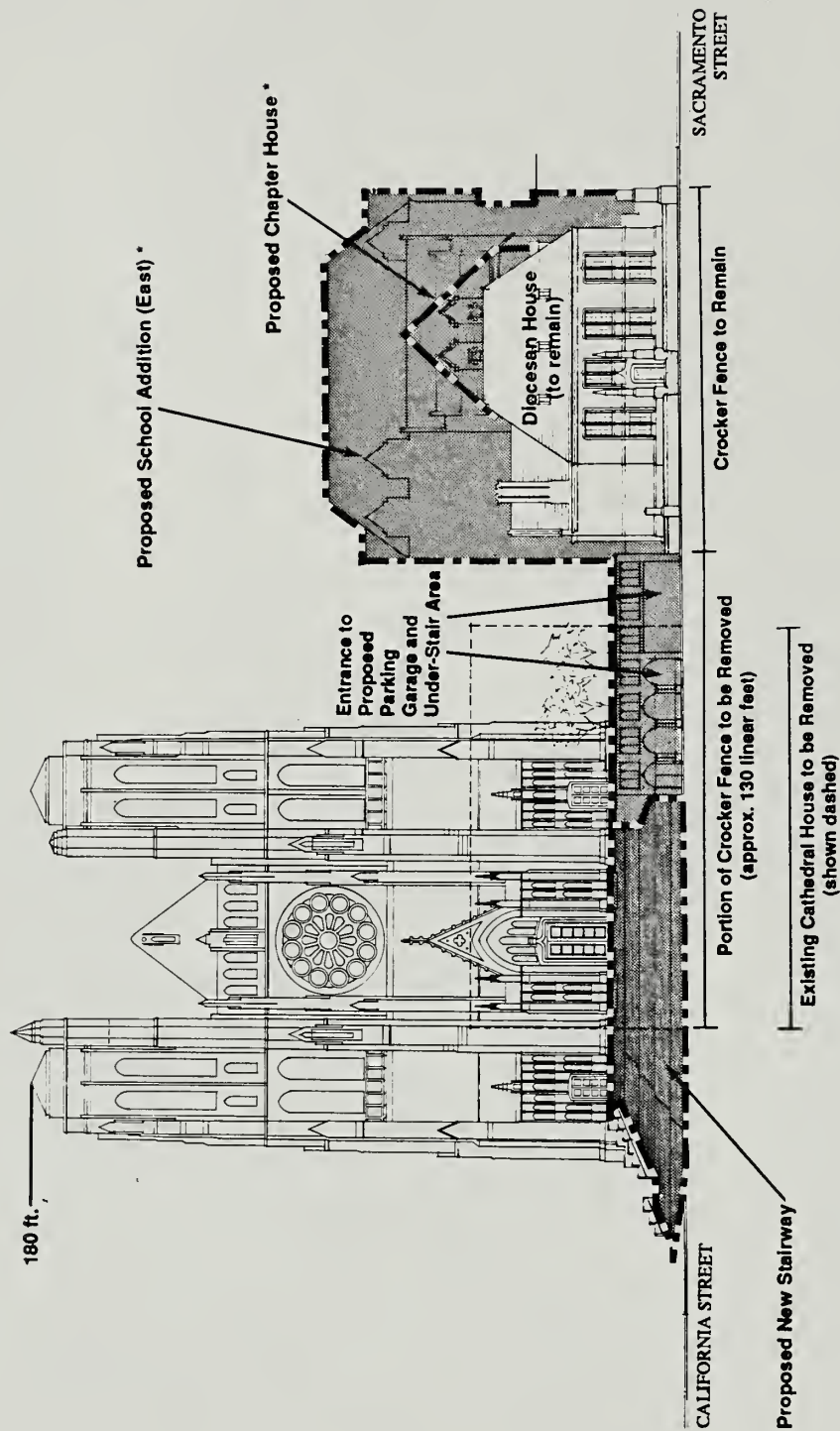
Proposed New Construction

Grace Cathedral

**● Figure 5(Revised)**  
First Basement Level  
Floor Plan

SOURCE: William Turnbull Associates





0 50  
Feet

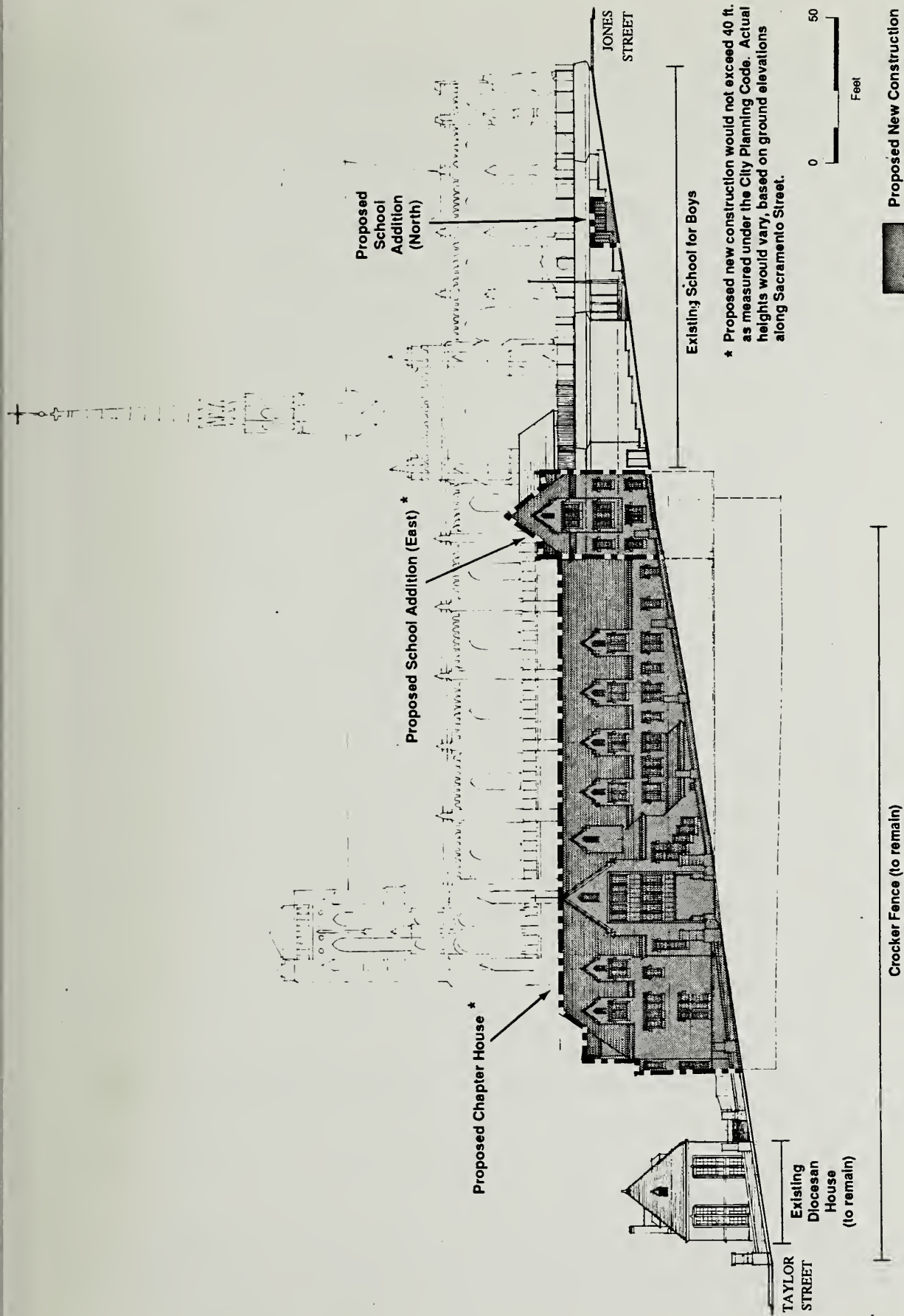
\* Proposed new construction would not exceed 40 ft. as measured under the City Planning Code. Actual heights would vary, based on ground elevations along Sacramento Street.

Proposed New Construction

SOURCE: William Turnbull Associates

Grace Cathedral

**Figure 6**  
Taylor Street Elevation



Grace Cathedral ■  
**Figure 7**  
 Sacramento Street Elevation

SOURCE: William Turnbull Associates

of about 28,500 sq. ft. No new construction would exceed 40 feet in height, measured as allowable under the *City Planning Code*.

The proposed subsurface parking garage would contain about 120 spaces on two levels, totaling approximately 48,600 sq. ft. The garage would be north of the Cathedral, partially under the proposed Chapter House and eastern school addition. Vehicle access to the site would be relocated from Sacramento Street to Taylor Street. The roof of the proposed parking garage would be a landscaped courtyard at the same approximate elevation as that of the existing surface parking lot, and would provide approximately 13,000 sq. ft. of usable open space between the Cathedral and the proposed Chapter House. An additional 4,200 sq. ft. of open area would be located in front of the Cathedral entrance. Total excavation required for the project would be approximately 24,500 cubic yards in volume, to a maximum depth of approximately 30 feet below existing grade.

The project would require the demolition of the existing four-story Cathedral House, which contains approximately 14,800 sq. ft. of office and meeting space and two dwelling units. The project would also require the removal of the existing Cathedral stairs and under-stair area, which contains approximately 6,500 sq. ft. of meeting space and a gift shop. The existing 65-space surface parking lot would also be removed, along with the approximately 3,500-sq.-ft. paved open area which is currently located between the Cathedral and the Cathedral House. The new staircase would lead from Taylor Street to the main doors of the Cathedral. Approximately 8,300 sq. ft. of meeting rooms and a gift shop would be located beneath the new staircase. Demolition of the Cathedral House and existing under-stair area, and construction of the Chapter House and new under-stair area, would result in a net increase of approximately 6,100 sq. ft. of interior area. The Cathedral itself and the existing Diocesan House would remain unchanged.

To accommodate the new staircase and access to the subsurface parking garage, approximately 130 linear feet of the Crocker Fence would be removed from the Taylor Street frontage of the site. The Crocker Fence originally surrounded nearly the entire block, except for the northwest portion where the Cathedral School for Boys is now located. The fence was originally approximately 1,150 feet long; approximately 490 linear feet remain. The approximately 130 linear feet of the Crocker Fence proposed for removal would be approximately 10 percent of the original length of the fence and approximately 30 percent of the remaining length of the fence. Approximately 90 linear feet of the removed fence would be relocated to the interior of the site north of the Cathedral, at the south side of the proposed landscaped courtyard. The remainder of the removed fence would consist of individual segments of relatively short lengths



- totaling about 40 linear feet; almost all of this portion of the fence would be relocated to currently unidentified areas of the project site./a/ The 90-foot portion of the Crocker Fence that would be removed, and the area to which that part of the removed fence would be relocated to, are shown on Figures 2 and 3 on pp. 17-18.

- The masonry and wrought-iron fence is the remaining artifact on-site of the Crocker Mansion that formerly occupied the Cathedral site until the 1906 earthquake and fire. The entirety of the Cathedral Close (Grace Cathedral and the area around it), excluding the Cathedral House and the
- existing parking lot, is designated City Landmark No. 170./2/ Also, the SHPO has determined that the Close appears eligible for listing on the National Register of Historic Places as a historic
  - district./3/ The Cathedral House, which the SHPO has determined contributes to the significance of a district which appears eligible for the National Register, was rated "3" in the 1976 Department of City Planning Architectural Inventory and identified by the *Here Today* survey. The Cathedral House was also included in the secondary survey area described in *Splendid Survivors*. The Foundation for San Francisco's Architectural Heritage has not completed ratings for buildings in this survey area.

The project, including the Chapter House, additions to the Cathedral School for Boys, subsurface parking garage, and new under-stair area, would result in a total of about 87,400 sq. ft. of new construction on the project site (see Table 1, p. 16). Following demolition and construction, the project would result in a net increase of about 66,100 sq. ft. of built area on the site. This net increase in built area would include approximately 11,400 sq. ft. in additions to the Cathedral School for Boys, approximately 48,600 sq. ft. in the proposed subsurface parking garage, approximately 4,300 sq. ft. resulting from the demolition of the Cathedral House and construction of the proposed Chapter House, and approximately 1,800 sq. ft. resulting from reconstruction of the under-stair area. The project would result in a net increase of about 55 parking spaces on the project site, after removal of the existing 65-space surface parking lot and construction of the proposed 120-space subsurface parking garage.

### **D. PROJECT SCHEDULE, COST AND APPROVAL REQUIREMENTS, AND MASTER PLAN POLICIES**

#### **PROJECT SCHEDULE AND COST**

The project sponsor expects environmental review, project review, and detailed design to be completed by late 1992. If the project were approved and building permits issued, construction

of the Chapter House, parking garage, main stairs, and under-stair area would take approximately 20 months. The proposed additions to the Cathedral School for Boys are included here as part of the project for the purpose of environmental review. The school additions might, however, occur several years after completion of other portions of the project. The foundation for the four-story

addition to the east side of the school would be constructed in coordination with the proposed subsurface parking garage. The final construction schedule would be dependent upon ongoing fundraising efforts. Total construction costs would be approximately \$9,000,000 for construction of the proposed Chapter House, subsurface parking garage, new staircase, demolition of the Cathedral House, and relocation of the Crocker Fence, and approximately \$2,000,000 for the school additions (1992 dollars).

### APPROVAL REQUIREMENTS

Following a public hearing before the City Planning Commission on the Draft EIR, responses to written and oral comments will be prepared. The EIR will be revised as appropriate and presented to the City Planning Commission for certification as to accuracy, objectivity and completeness. No permits may be issued before the Final EIR is certified. As proposed, the project would have a significant effect on the environment which could not be avoided if the project were implemented (see Chapter VI, p. 85). For this reason, the City Planning Commission would have to disapprove the project or, in order to approve the project, would have to find that alternatives are infeasible and that the project's significant effect would be acceptable due to overriding considerations.

On November 14, 1986, the voters of San Francisco passed Proposition M, the Accountable Planning Initiative, which established eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under CEQA or adopting any zoning ordinance or development agreement, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. The City Planning Commission, in its decision regarding the proposed project approval or disapproval would make a determination of the project's conformance with the Priority Policies (*City Planning Code* Section 101.1).

Because the project would involve a City Landmark, the project would require a Certificate of Appropriateness pursuant to Section 1006.2 of the *City Planning Code*. Because the proposed project would involve construction, removal, and demolition of part of a City Landmark, the Planning Commission would hold a public hearing on the application for a Certificate of

Appropriateness following review and a recommendation by the Landmarks Preservation Advisory Board (LPAB). Review by the LPAB would also include a public hearing.

The project is being proposed as a Planned Unit Development (PUD) under Section 304 of the *City Planning Code*. Consideration of the project as a PUD is permitted for sites greater than one-half acre in size. According to Section 304(a):

The procedures for Planned Unit Developments are intended for projects on sites of considerable size, developed as integrated units and designed to produce an environment of stable and desirable character which will benefit the occupants, the neighborhood, and the City as a whole. In cases of outstanding overall design, complementary to the design and values of the surrounding area, such a project may merit a well reasoned modification of certain of the provisions contained elsewhere in this Code.

Under Section 304, the project sponsor will be requesting City Planning Commission approval for modification of the standard rear yard requirements as part of the PUD. Planned Unit Developments require Conditional Use authorization from the City Planning Commission. In addition, religious and educational institutions require Conditional Use authorization in RM-4 Use Districts. The City Planning Commission would hold a public hearing to consider the project's application for Conditional Use authorization in accordance with Sections 303 and 304 of the *City Planning Code* and would adopt a motion approving, approving with conditions, or disapproving the project.

The application and public hearing regarding the Conditional Use authorization may be combined with the Certificate of Appropriateness, per Section 1006.1(e) of the *City Planning Code*. If the project were approved by the City Planning Commission, the project sponsor must obtain building and related permits from the Central Permit Bureau of the Department of Public Works. An application for a Site Permit for the project has not been filed to date.

### MASTER PLAN POLICIES

As noted above, the project would be reviewed by the City Planning Commission in the context of applicable objectives and policies of the *San Francisco Master Plan*. Some of the key objectives and policies are noted here.



### Residence Element

- Objective 12, Policy 3, to "minimize disruption caused by expansion of institutions into residential areas."

### Commerce and Industry Element

- Objective 7, Policy 2, to "encourage the extension of needed health and educational services, but manage expansion to avoid or minimize disruption of adjacent residential areas;" and Policy 3, to "promote the provision of adequate health and educational services to all geographical districts and cultural groups in the city."

### Transportation Element

- Objective 3, Policy 1, to "improve speed of transit travel and service by giving priority to transit vehicles where conflicts with auto traffic occur, and by establishing a transit preferential streets system."
- Objective 10, to "ensure that the provision of new or enlarged parking facilities does not adversely affect the livability and desirability of the city and its various neighborhoods;" and Policy 1, to "ensure that new or enlarged parking facilities meet need, locational and design criteria."

### Urban Design Element

- Objective 2, Policy 4, to "preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development;" Policy 6, to "respect the character of older development nearby in the design of new buildings;" and Policy 7, to "recognize and protect outstanding and unique areas that contribute in an extraordinary degree to San Francisco's visual form and character."
- Objective 3, Policy 1, to "promote harmony in the visual relationships and transitions between new and older buildings;" Policy 2, to "avoid extreme contrasts in color, shape and other characteristics which will cause new buildings to stand out in excess of their public importance;" Policy 5, to "relate the height of buildings to important attributes of the city pattern and to the height and character of existing development;" and Policy 6, to "relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction."

### Community Safety Element

- Objective 2, to "preserve, consistent with life safety considerations, the architectural character of buildings and structures important to the unique visual image of San Francisco."

### NOTE - Project Description

- /a/ Although the project sponsor would attempt to relocate all of the remaining 40 linear feet of the Crocker Fence on site, small portions of the fence could chip off or otherwise be damaged during the removal process, or could be of such short lengths that their relocation would be infeasible. Thus, "almost" all 40 linear feet would be relocated.
- /1/ Paul Lobush, William Turnbull Associates, telephone conversation, April 20, 1992.
- /2/ The precise location, boundaries, and characteristics of the Cathedral Close are described in City Planning Case File No. 83.560L (the Landmark designation report). In general, a "close" is defined as "an enclosed space around or at the side of a building; especially the neighborhood of a cathedral." (Cyrill Harris, ed., Illustrated Dictionary of Historic Architecture, Dover Publications, New York, 1983, p. 122. Originally published in 1977 by McGraw-Hill Book Company as Historic Architectural Sourcebook.)
- /3/ The SHPO has determined that the Cathedral Close appears eligible for listing on the National Register of Historic Places as a historic district in a letter dated October 28, 1992. Additionally, the SHPO determined that the Crocker Fence appears individually eligible for National Register listing as a rare survivor of the 1906 earthquake and fire. The letter containing this preliminary determination of eligibility and a copy of the nomination form submitted to the SHPO have been included in the project case file at the Department of City Planning, 450 McAllister Street, San Francisco.

### III. ENVIRONMENTAL SETTING

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#### A. LAND USE AND ZONING

##### LAND USE

The project site occupies the entire block bounded by Taylor, California, Jones, and Sacramento Streets in the Nob Hill area of San Francisco. The site includes Grace Cathedral, which contains approximately 69,000 sq. ft. of interior area; the four-story, approximately 14,800-sq.-ft. Cathedral House; the two-story, approximately 17,100-sq.-ft. Cathedral School for Boys; the two-story, approximately 5,900-sq.-ft. Diocesan House; a paved 65-space surface parking lot, a paved open area between the Cathedral House and the Cathedral, and landscaping throughout the site. Land uses on the project site include religious and educational (institutional) uses associated with Grace Cathedral and the Cathedral School for Boys. Accessory uses include office space, meeting rooms, two dwelling units, and off-street parking.

The Cathedral and other existing building on the site currently accommodate events which range in attendance from under 10 individuals for the regularly scheduled morning Holy Eucharist, to over 2,000 individuals for one-time special events such as the Dalai Lama address in April of 1991. Events at Cathedral facilities attract parishioners from the entire Episcopal Diocese as well as members of the surrounding community. Weekly events include bereavement groups (3-12 people); AIDS/ARC Support Group meetings (5-15 people); congregational bible study groups (10-20 people); Alanon meetings (20-30 people); Narcotics Anonymous meetings (80-100 people); and Tuesday Downtown AA meetings (350-400 people to as many as 725 people). Events held monthly include diocesan group meetings, such as Episcopal Charities Agency meetings (10-20 people); Department of Elders meetings (10-15 people); and Department of Missions meetings (about 30 people). Annual events include the convention of Diocesan Episcopal Church Women (about 140 people); the Festival of Remembrance service for the Royal British Legion (about 300 people); the reception for the Nob Hill Association after the Huntington Park Christmas tree lighting ceremony (300-325 people); and the annual symposium of the Trinity Institute (about 550 people).

Multi-family residential and hotel uses predominate in the site vicinity, with some single-family residential, retail, commercial, and other institutional uses, such as Saint Francis Hospital at



Hyde and Bush Streets, in the greater project area. To the east of the site, across Taylor Street, is Huntington Park, with the Pacific Union Club further to the east, adjacent to the east side of the park. The Fairmont, Stanford Court, and Mark Hopkins hotels are about one block east of the site. The blocks to the northeast, north, northwest, west, and southwest of the project site are dominated by multi-family residential uses consisting of low- to high-rise apartment buildings. The block to the south of the project site, across California Street, contains mid- and high-rise apartment buildings, neighborhood serving retail uses, a small hotel, and the Masonic Auditorium. The block to the southeast of the project site, across Taylor Street, contains the Huntington Hotel, a parking garage, and low- and mid-rise apartment buildings. Overall, the Nob Hill area is densely developed with a variety of uses. Existing uses in the area, including Grace Cathedral, Masonic Auditorium, and area hotels, attract large numbers of people into the vicinity. Land uses in the project site vicinity are shown in Figure 8.

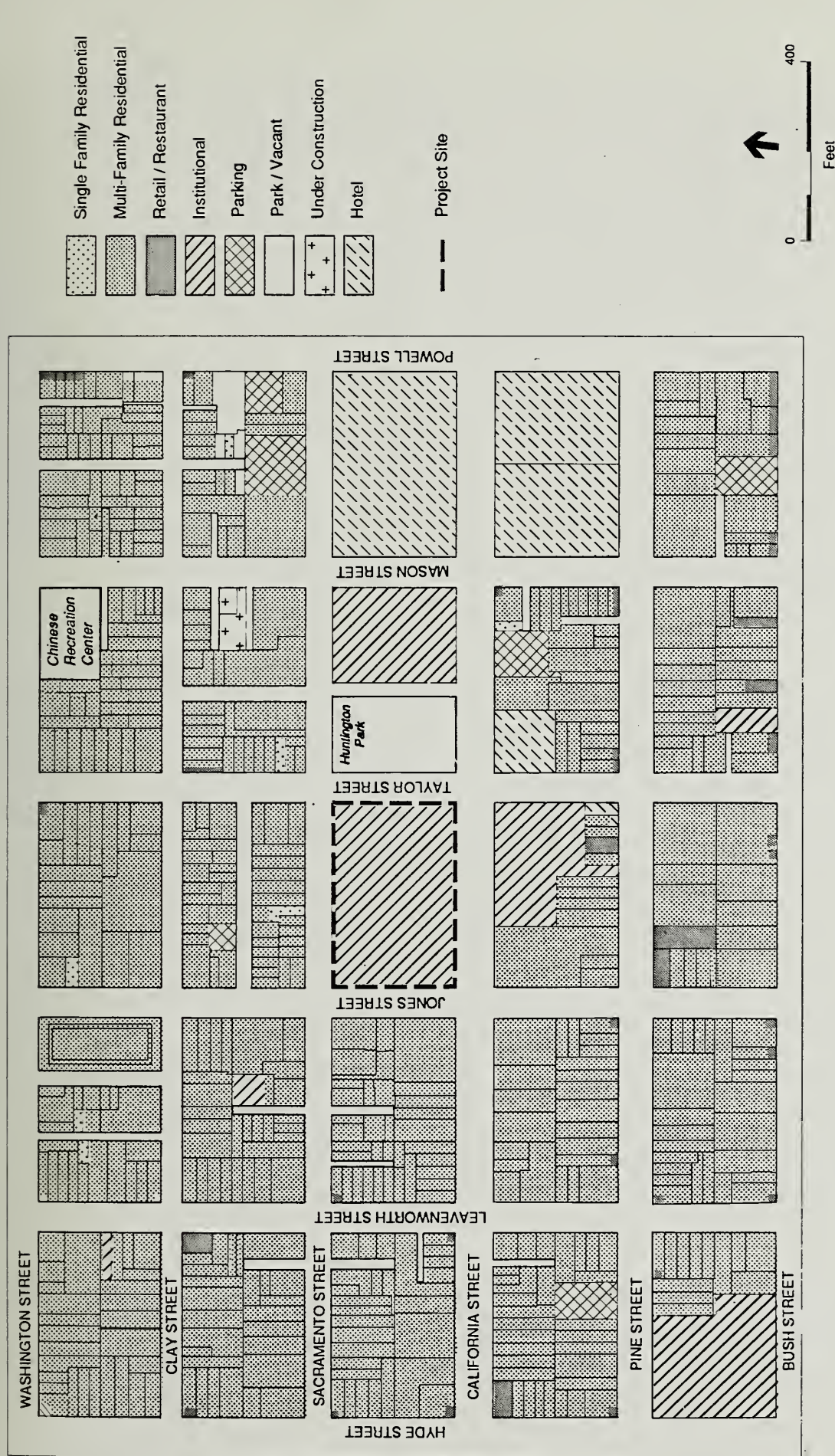
#### ZONING

The project site is located in an RM-4 (Residential Mixed, High Density) Use District (see Figure 9, p. 32). Principal permitted uses in RM-4 districts identified in the *City Planning Code* include apartment buildings of high density, group housing, and supporting non-residential uses. Institutional uses such as the project are allowable as Conditional Uses. The project site falls within the Nob Hill Special Use District, which allows hotels of six or more guestrooms, incidental commercial uses, private lodges, private clubhouses, and private recreational facilities as Conditional Uses.

Other Use Districts in the site vicinity include P (Public Use) Districts east of the site (Huntington Park); RM-3 (Residential Mixed, Medium Density) Districts north and west of the site; RH-2 (Residential House, Two-Family) Districts one block northwest of the site; RC-4 (Residential-Commercial Combined, High Density) Districts one and one-half blocks to the southwest and south of the site; and RM-3 (Residential Mixed, Medium Density) Districts one block southeast of the site.

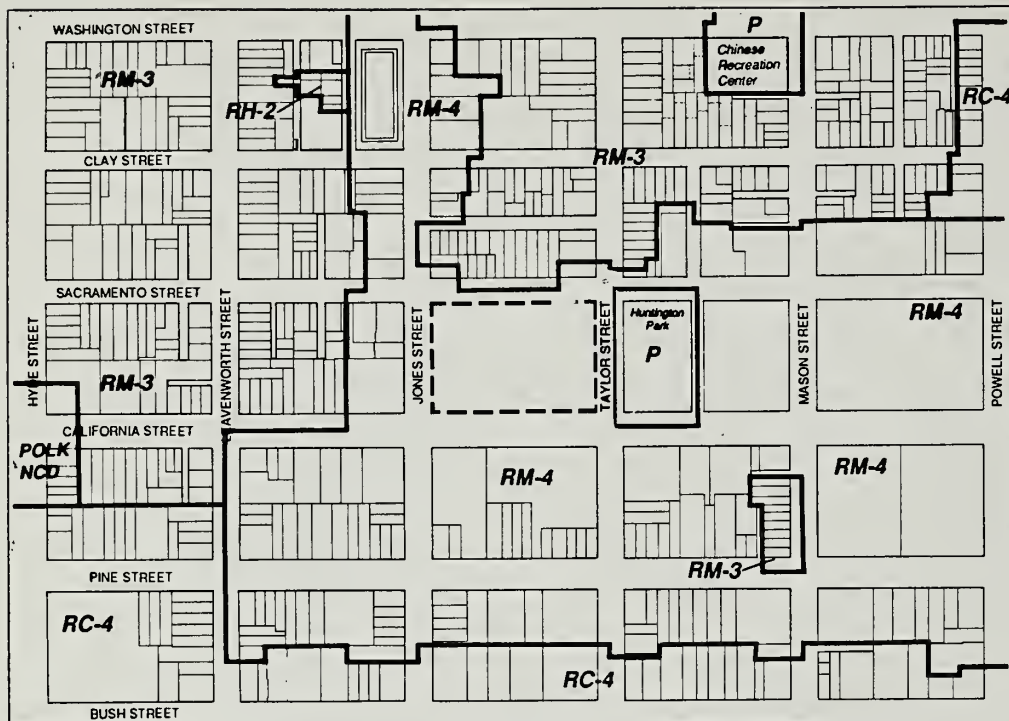
The site is located in a 65-A Height and Bulk District (see Figure 9, p. 32). The 65-A Height and Bulk District limits the maximum allowable height to 65 feet, with certain bulk restrictions above 40 feet. The project structures would be 40 feet or less in height, as measured under the *City Planning Code*. The predominant Height and Bulk District in the site vicinity is 65-A, except for Huntington Park across Taylor Street from the site which is designated OS (Open





SOURCE: Environmental Science Associates, Inc.

Grace Cathedral ■  
**Figure 8**  
 Land Use Map

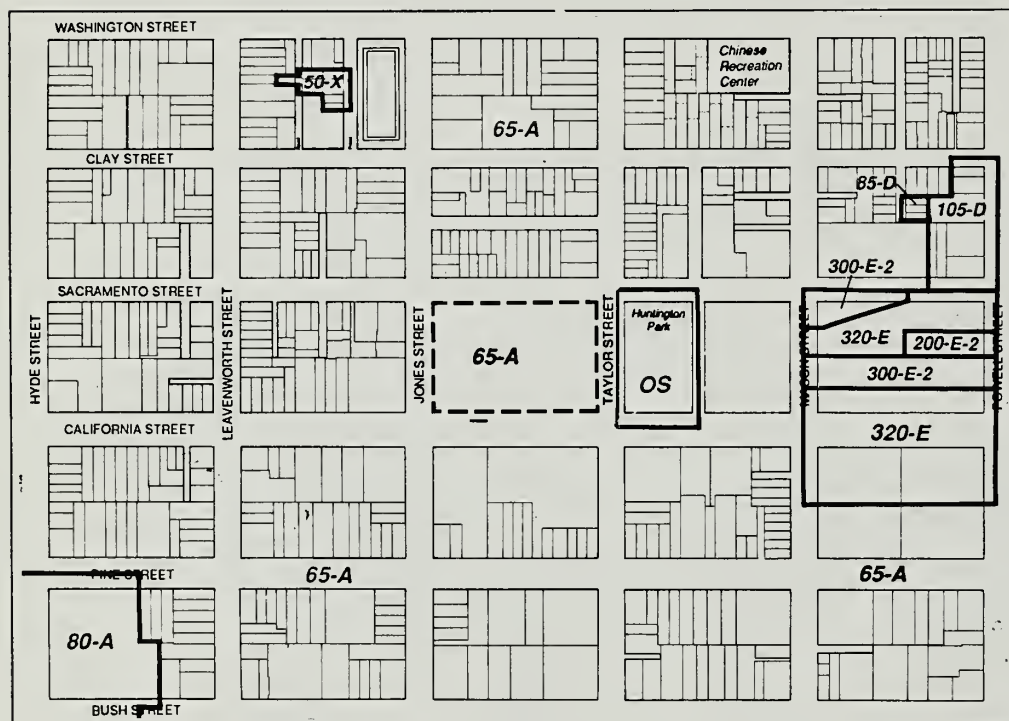


#### PLANNING CODE USE DISTRICTS

- RH-2** Residential House Districts, Two Family
- RM-3** Residential, Mixed Districts Medium Density
- RM-4** Residential, Mixed Districts High Density
- RC-4** Residential-Commercial Combined Districts, High Density
- NCD** Neighborhood Commercial District

**P** Public Use Districts

--- Project Site



#### HEIGHT AND BULK DISTRICTS

Numbers are height limits in feet.  
Letter symbols refer to bulk limits  
Suffix numbers identify districts in which special regulations apply.

**OS** Open Space District

**A** Maximum plan dimensions apply above 40'

**D** Maximum Plan dimensions apply above 40'

**E** Maximum plan dimensions apply above 65'

**X** Bulk limits not applicable

--- Project Site



SOURCE: Environmental Science Associates, Inc.

Grace Cathedral

**Figure**  
Planning Code Use Districts  
and Height and Bulk Districts



Space District), and the area two blocks east of the project site which includes 85-D, 105-D, 200-E-2, 300-E-2, and 320-E height and bulk district designations and allow buildings up to between 85 and 320 feet in height.

## **B. ARCHITECTURAL, HISTORIC AND CULTURAL RESOURCES**

### **ARCHITECTURAL AND HISTORIC RESOURCES**

#### **Architectural Surveys**

The San Francisco Department of City Planning (DCP) conducted a citywide inventory of architecturally significant buildings in 1976. In the 1976 DCP Architectural Inventory, approximately ten percent of the City's entire stock of buildings was awarded a rating for architectural merit ranging from a low of "0" to a high of "5." The buildings that were rated from "3" to "5" represent the highest two percent of the City's entire building stock. Appendix B, pp. A.28-29, contains further explanation of the rating system used by the 1976 DCP Survey.

The Junior League of San Francisco completed a survey of historically and architecturally significant structures in San Francisco, Marin, and San Mateo counties in 1968. The Junior League survey did not assign ratings to individual buildings. The survey describes historic structures based on evaluation criteria including the structure's age, its association with an historic event or famous person, and whether it was a representative example of a particular style and/or the work of an important architect or builder. The results of the Junior League study are published in the book *Here Today*, recognized by the City as an official inventory of historic structures.

The project site is within the secondary survey area of the architectural inventory conducted by the Foundation for San Francisco's Architectural Heritage. The Heritage inventory describes buildings within primary and secondary survey areas of Nob Hill in the book *Splendid Survivors*, and assigns ratings to buildings within the primary survey area. Ratings have not been assigned by Heritage to structures, such as those on the Grace Cathedral property, which are within the secondary survey area, because the Foundation for San Francisco's Architectural Heritage has not surveyed the crest of Nob Hill.

Figure 10 identifies buildings in the project area that are listed on the National Register of Historic Places, listed as National Historic Landmarks, and/or are designated City Landmarks. Buildings listed in the Department of City Planning 1976 Architectural Inventory are also shown.





Buildings in the project area that are listed on the National Register of Historic Places, listed as National Historic Landmarks, designated City Landmarks, and/or rated by the 1976 DCP Inventory, include the Chambord Apartments at 1298 Sacramento Street (National Register of Historic Places, City Landmark No. 106, DCP "4" rating, across Sacramento Street from the site); the Pacific Union Club (the old Flood Mansion) at 1000 California Street (National Register of Historic Places, National Historic Landmark, City Landmark No. 64, DCP "5" rating, one block east of the site); the Fairmont Hotel at 950 Mason Street (City Landmark No. 185, DCP "4" rating, two blocks east of the site); the Mark Hopkins Hotel at 850 Mason Street (City Landmark No. 184, DCP "1" rating, two blocks east of the site); the Stanford Court Hotel at 905 California Street (DCP "2" rating, two blocks east of the site); and various apartment buildings and townhouses in the site vicinity. The area surrounding the project site is included in the secondary survey area described in *Splendid Survivors*. The Foundation for San Francisco's Architectural Heritage has not completed ratings for buildings in this survey area. Various structures in the vicinity are also included in *Here Today*.

The San Francisco Cable Cars are listed on the National Register of Historic Places and are a National Historic Landmark. The California Cable Car line runs on California Street adjacent to the project site, and the Powell-Hyde and Powell-Mason Cable Car lines run on Powell Street two blocks east of the project site. The Lower Nob Hill Apartment Hotel District, listed on the National Register of Historic Places, is located about two blocks south of the site at Bush Street.

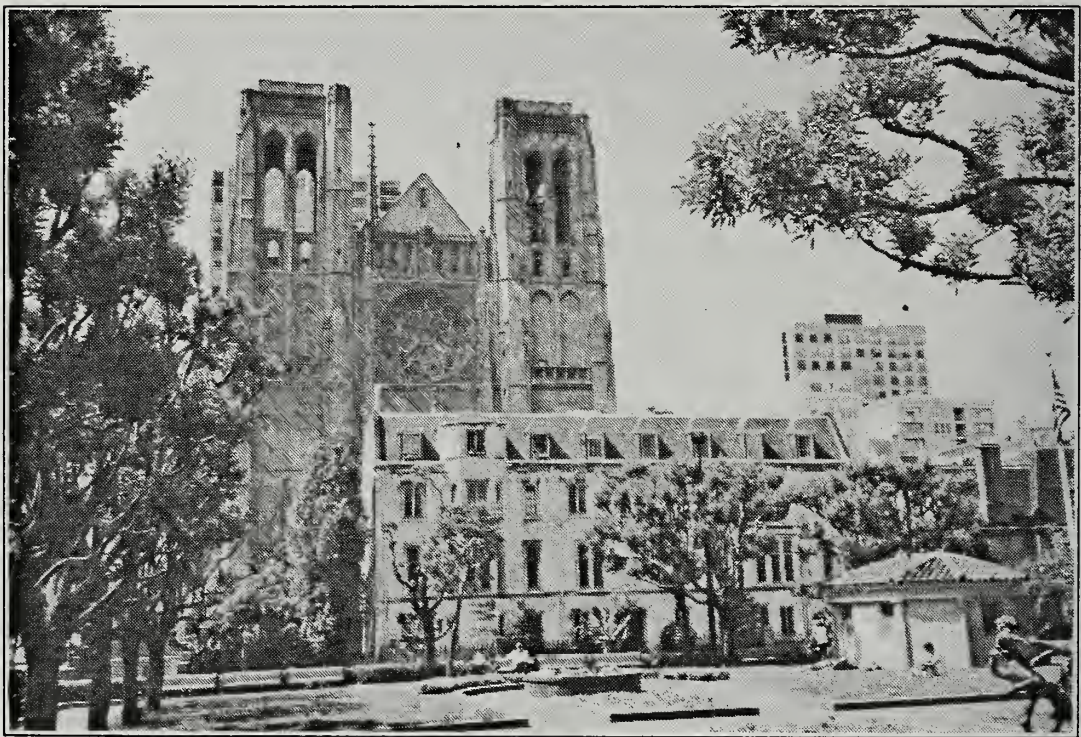
#### Project Site

The project site currently contains Grace Cathedral, the Cathedral House, the Diocesan House, the Cathedral School for Boys, a paved surface parking lot, an open paved area, and landscaping; northern and eastern boundaries of the site also contain portions of the Crocker Fence. Figures 11 through 13, pp. 36-38, are photographs of the project site. The entirety of the Cathedral Close (Grace Cathedral and the area around it), excluding the Cathedral House and existing parking lot, is designated City Landmark No. 170 and is subject to the provisions of Article 10 of the *City Planning Code*.<sup>1/</sup> The Cathedral House was recommended for inclusion in City Landmark No. 170 by the City Planning Commission and the Landmarks Preservation Advisory Board; it was excluded from the final designation by the Board of Supervisors. The SHPO has determined that the Cathedral Close appears to be eligible for listing on the National Register of Historic Places as a historic district. The SHPO has further determined that the Crocker Fence, Cathedral House, Diocesan House, and the Cathedral are contributing structures within this district (i.e., they contribute to the district's overall significance). Additionally, the SHPO has determined that the Crocker Fence appears to be individually eligible for National Register listing as a rare survivor of the 1906 earthquake and fire.<sup>1a/</sup>





View of Site Looking Northwest from Taylor and California Streets



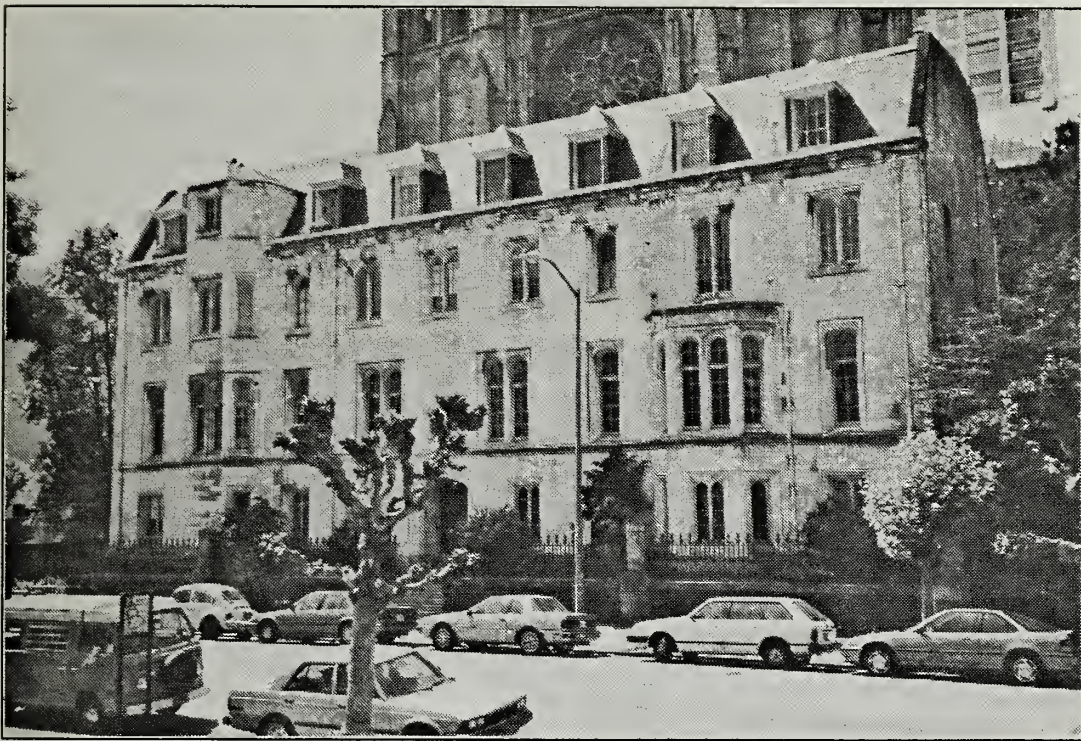
View of Site Looking West from Huntington Park

SOURCE: Environmental Science Associates, Inc.

Grace Cathedral ■

**Figure 11**  
Views of Site





View of Cathedral House (to be demolished) with portion of Crocker Fence in foreground (to be removed) from Taylor Street



View of Cathedral House (to be demolished) with portion of Crocker Fence in foreground (to be removed) along Taylor Street

— Grace Cathedral ■

SOURCE: Environmental Science Associates, Inc.

## Figure 12

Views of Cathedral House (to be demolished)  
and Portion of Crocker Fence (to be removed)



- The Grace Cathedral site was previously occupied by the Charles Crocker mansion, built in c. 1876. The Second Empire style mansion and its outbuildings and stable for a time occupied the entire block bounded by Taylor, California, Jones, and Sacramento Streets near the summit of Nob Hill. The property was bounded on the north, east, and south by a large-scale masonry and wrought-iron fence, portions of which remain today. In 1888, Crocker's son, William H. Crocker, built a Queen Anne-style mansion immediately to the west of his father's house. Both mansions became the center of Nob Hill society during the late 19th century. In 1906, all structures on the site, with the exception of the Crocker Fence, were destroyed by the fire which followed the earthquake./2/

The Crocker Fence, circa 1877, is the oldest feature included in City Landmark No. 170 and, as noted above, is the only structure on the Grace Cathedral property which pre-dates the earthquake and fire of 1906. The Crocker Fence originally surrounded nearly the entire block, except for the northwest portion where the Cathedral School is now located. The fence was originally about 1,150 feet long. Approximately 490 linear feet remain. The surviving portions of the original Crocker Fence and Carriage Gate are located on the eastern (Taylor Street) and northern (Sacramento Street) boundaries of the site. The fence is composed of a basalt and granite base topped by a wrought-iron fence interspersed by granite pylons. The fence averages nine feet in height along Taylor Street; the carriage gate pylons and lampstands along Sacramento Street average thirteen feet in height./2/ The Crocker Fence is shown in its original context around the Crocker Mansion in Figure 14.

The Crocker Fence is significant because of its association with the Crocker Mansion, and because of its value as an example of Victorian masonry and iron-work construction, circa 1877./2/ The surviving fence includes the original rear carriage gateway from Sacramento Street to the Crocker Mansion. Portions of the fence along Taylor Street were removed to accommodate the entrances to the Cathedral House (in 1911) and the Diocesan House (in 1935). Over the years, pieces of the existing iron fence have broken off. The fence was not rated in the

- 1976 DCP inventory nor described in *Here Today*. The SHPO has determined that the Crocker Fence appears eligible for listing on the National Register of Historic Places both individually and as a contributing structure within a historic district.
- The Crocker family donated the site to Grace Cathedral Corporation in 1907, as memorialized by a plaque on the right side of the south portal. A cathedral design prepared by English architect George F. Bodley in 1907 envisioned the cathedral flanking Jones Street with its main facade and entrance facing California Street. The cornerstone for this design was laid in 1910 and retaining/





View of Diocesan House (to remain) with portion of Crocker Fence (to remain) from Taylor Street near Sacramento Street



View of Cathedral School for Boys (to remain) from Sacramento Street

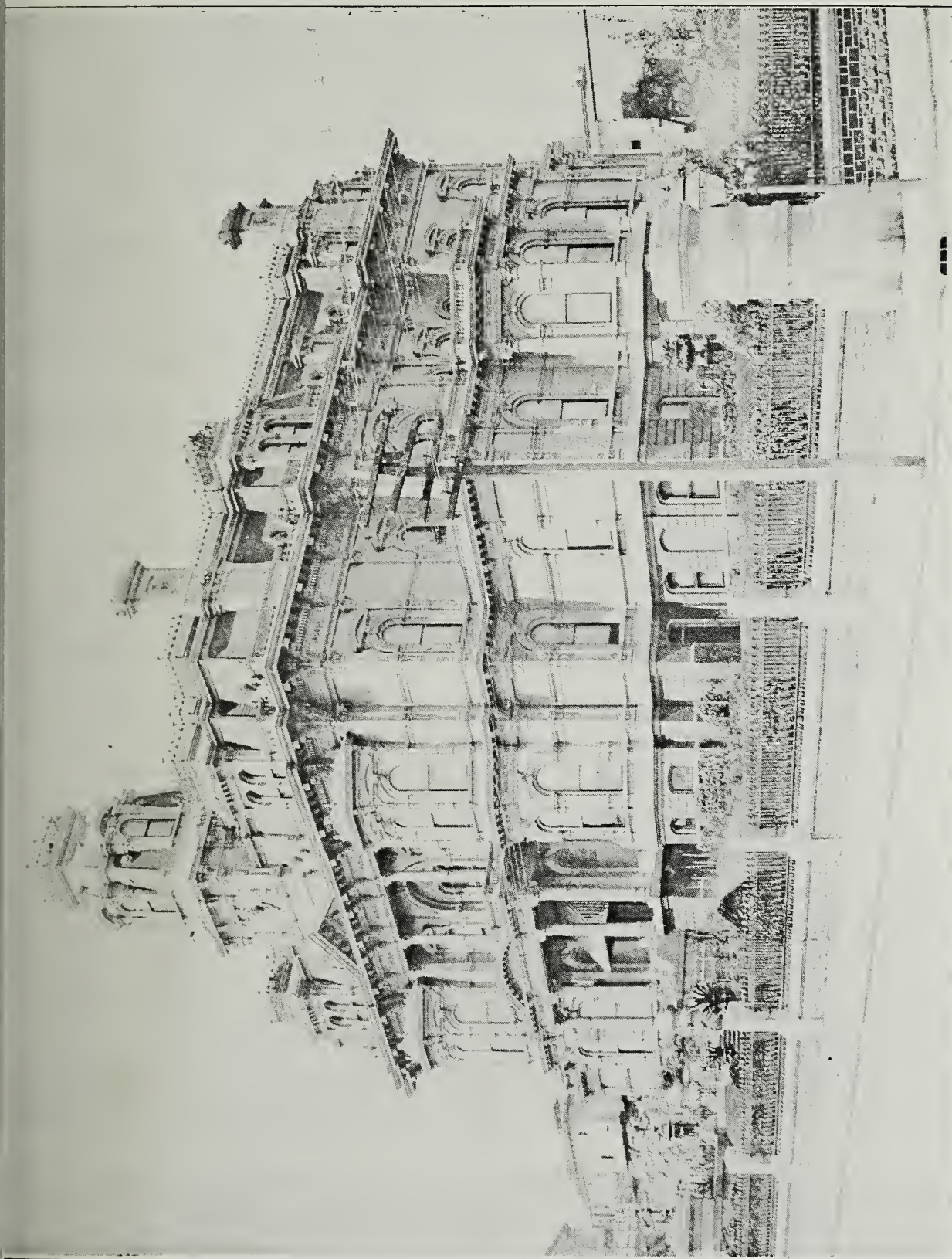
SOURCE: Environmental Science Associates, Inc.

Grace Cathedral ■

**Figure 13**  
Views of Diocesan House (to remain) and  
Cathedral School for Boys (to remain)



foundation walls were constructed on the northern portion of the site. On the death of Bodley, Lewis P. Hobart, a San Francisco architect, took over the project and revised the design for the Cathedral Close. Hobart's revised plans, completed in



SOURCE: Victorian Classics of San Francisco, Windgate Press, 1987

Grace Cathedral ■

**Figure 14**  
Pre-1906 View of Crocker Mansion and  
Crocker Fence from California and Taylor Streets

1926, changed the position of the cathedral to flank California Street, with the main entrance facing Taylor Street. As part of this proposal, Hobart envisioned the eventual removal of the Cathedral House and a portion of the Crocker Fence and the construction of a staircase leading from Taylor Street to the main entrance of the Cathedral. Construction of the cathedral began in 1928 and was not completed until 1964. The Cathedral House partially blocks the eastern approach to the main cathedral entrance./2/ Bronze doors, which are one of about five casts from the molds of the doors originally cast in Italy by Renaissance artist Lorenzo Ghiberti in the 1400's, were installed at the main entrance to the Cathedral in 1964./3/

Grace Cathedral is the third largest Episcopal cathedral in the United States. The architectural style of the cathedral is Gothic with some French and Spanish influence, while the dominant materials are concrete and steel with some cut stone. The Cathedral is included in City

- Landmark No. 170, and rated "5" in the 1976 DCP Inventory; as stated earlier, the SHPO has determined that the Cathedral appears to be eligible for listing on the National Register of Historic Places as a contributing structure within a historic district. *Here Today* notes that the
- Cathedral is an example of reinforced-concrete Gothic construction./4/ Grace Cathedral was also included in the secondary survey area as described in *Splendid Survivors*, p. 227. The Foundation for San Francisco's Architectural Heritage has not surveyed the crest of Nob Hill, or assigned ratings to buildings in that secondary survey area.

The four-story Cathedral House (Gibbs Hall) facing Taylor Street was built in 1912 in conformance with the 1907 Bodley plan, and was designed by Lewis Hobart, architect of many public buildings and private homes in the Bay Area. The Cathedral House was the first structure to be built on the site after the 1906 earthquake and fire. The Cathedral House was constructed as a seminary building, and was sited consistent with the Bodley plan that would have placed the main Cathedral facade on California Street. This Tudor-Revival style building is faced with cut limestone on its east and west sides and brick on its north and south sides; the roof is covered with slate tiles. The Cathedral House was originally designed to house the Church Divinity School of the Pacific Seminary, and has since served as a residence for various diocesan clergy. It is currently used as the cathedral office building and as a residence for two cathedral employees./2/

The facade and decorative elements of the Cathedral House are composed of limestone blocks. In the years since the construction of the Cathedral House, the limestone has deteriorated and is spalling (chipping off). A structural evaluation of the Cathedral House conducted in 1984 noted

- that the structure would be subject to damage and distress in a major earthquake./5/ The SHPO



- has determined that the Cathedral House appears to be eligible for listing on the National Register of Historic Places as a contributing structure within a historic district. The Cathedral House is not included in City Landmark No. 170; it was rated "3" in the 1976 DCP Inventory. *Here Today* praises the use of materials in the Cathedral House, and notes that the structure would probably be removed to reveal the main Cathedral facade. The Cathedral House was also included in the secondary survey area as described in *Splendid Survivors*, p. 227. The Foundation for San Francisco's Architectural Heritage has not surveyed the crest of Nob Hill, or assigned ratings to buildings in that secondary survey area.

The two-story Diocesan House, also designed by Lewis Hobart, faces Taylor Street immediately north of the Cathedral House, and was built in 1935. The Gothic-style building is constructed of reinforced concrete and has a slate tile roof. The Diocesan House serves as the headquarters of the Episcopal Church in the San Francisco Bay Area and contains the bishop's office and other administrative offices./2/ The SHPO has determined that the Diocesan House appears to be eligible for listing on the National Register of Historic Places as a contributing structure within a historic district. The Diocesan House is included in City Landmark No. 170, and was rated "3" in the 1976 DCP Inventory. The Diocesan House was also included in the secondary survey area as described in *Splendid Survivors*, p. 227. The Foundation for San Francisco's Architectural Heritage has not surveyed the crest of Nob Hill, or assigned ratings to buildings in that secondary survey area. The Diocesan House is not described in *Here Today*.

The two-story Cathedral School for Boys is located at the corner of Sacramento and Jones Streets. Completed in 1966, the building is a modern-style structure designed by George Rockrise and William J. Watson. The concrete building is set into the topography of the site and has a rooftop playground. The Cathedral School for Boys, founded in 1957, is the first Episcopal cathedral boys' school west of Washington, D.C., and the third in the United States./2/ The Cathedral School for Boys is included in City Landmark No. 170. The building was not rated in the 1976 DCP Inventory nor described in *Here Today*. The Cathedral School for Boys is located within the boundaries of the historic district that the SHPO has determined appears to be eligible for listing on the National Register of Historic Places; it does not contribute to the significance of the district by virtue of its more recent construction date.

#### CULTURAL RESOURCES

In its natural condition, the proposed project site was situated near the peak of Nob Hill, and supported vegetation such as grasses, scrub brush, and occasional stands of oak trees. There is no archival record of Native American habitation or prehistoric cultural resources at the site. There is also no evidence that the proposed project site was occupied during the Spanish, Mexican, or the early American Periods (1776-1848)./6/

The first documented reference to the Grace Cathedral site is from 1849, when the site (i.e. the block bounded by California, Sacramento, Taylor, and Jones Streets) was divided into six lots and sold to private investors. The 1852 U.S. Coast and Geodetic Survey Map of San Francisco indicates that no development had taken place by the middle of 1851. Despite lack of documentation, some cultural activity could have occurred in the area during the early years of

the Gold Rush. From 1852 onward, the Nob Hill area developed rapidly and by 1857 the Grace Cathedral site was occupied by approximately 15 unidentified structures, apparently modest cottages. While some cutting and filling may have taken place in the 1850s to 1860s to bring the project area into conformance with the official City grade system, no notable alteration to the original topography took place.

In the early 1870's, Nob Hill became the site of mansions belonging to some of the City's wealthiest citizens. The Grace Cathedral property was the location of the residence of railroad



magnate, Charles Crocker. Crocker purchased twelve small homes to acquire the lots needed to build his mansion, which was completed in 1876. One owner of a lot near the corner of Sacramento and Taylor Streets was a local Chinese undertaker named Yung, who refused to sell. Crocker constructed a 40-foot-high "spite fence" around three sides of Yung's house, to eliminate his views. Yung agreed to sell years later, and his house and the fence were demolished. Additional structures on the Grace Cathedral property around the turn of the century included the Crocker outhouse, greenhouse, an unidentified two-story structure, and a dwelling belonging to William and Ethel Crocker.

Structures on Nob Hill were destroyed in the second day of the fire which followed the earthquake of 1906. All structures on the site were destroyed except for portions of the fence around the property including those which survive in the original location. After the fire, Charles Crocker's heirs bequeathed the vacant property to Grace Church, formerly near the intersection of California and Stockton Streets. From this time onward, buildings on the Grace Cathedral site evolved to their current configuration.

#### NOTES - Architectural, Historic and Cultural Resources

/1/ The precise location, boundaries, and characteristics of the Cathedral Close are described in City Planning Case File No. 83.560L (the landmark designation report). In general, a "close" is defined as "an enclosed space around or at the side of a building; especially the neighborhood of a cathedral." (Cyrill Harris, ed., Illustrated Dictionary of Historic Architecture, Dover Publications, New York, 1983, p. 122. Originally published in 1977 by McGraw-Hill Book Company as Historic Architectural Sourcebook.)

● /1a/ The State Historic Preservation Officer (SHPO) has determined that the Cathedral Close appears to be eligible for listing on the National Register of Historic Places as a historic district in a letter dated October 28, 1992. The SHPO has further determined that the Crocker Fence appears to be individually eligible for National Register listing as a rare survivor of the 1906 earthquake and fire. The letter containing this preliminary determination of eligibility and a copy of the nomination form submitted to the SHPO have been included in the project case file at the Department of City Planning, 450 McAllister Street, San Francisco.

/2/ This discussion is based in part on *Supplemental Information Prepared by Grace Cathedral Archivist Michael D. Lampen*, on file and available for review at the Department of City Planning, 450 McAllister Street, San Francisco.

/3/ Michael D. Lampen, *The Gates of Paradise*, 1991. The original doors hang on the Cathedral Baptistry of St. John in Florence.

/4/ Junior League of San Francisco, *Here Today*, San Francisco's Architectural Heritage, Chronicle Books, San Francisco, 1968.

- /5/ H. J. Degenkolb Associates, Engineers, letter to Grace Cathedral Corporation, August 30, 1984.
- /6/ Archaeological information in this section is from Allen G. Pastron, Ph.D., President, Archeo-Tec, *Cultural Resources Evaluation of the Grace Cathedral Project*, San Francisco, CA, October 1991. A copy of this report is on file at the Department of City Planning, 450 McAllister Street, San Francisco.

### C. URBAN DESIGN AND VISUAL QUALITY

The project site contains four structures: Grace Cathedral (on the southern portion of the site), the Cathedral House (on the east side of the site), the Diocesan House (on the northeast corner of the site), and the Cathedral School for Boys (on the northwest corner of the site) (see Figures 11 through 13, pp. 36-38). The project site contains a paved open space area to the east of the Cathedral, between the Cathedral and the Cathedral House. A staircase from the corner of Taylor and California Streets leads to that open space area, the Cathedral, and the Cathedral House. The site also contains a paved surface parking lot and the northern and eastern boundaries of the site are partially fenced by portions of the original fence and gate of the Crocker Mansion. The mansion itself was destroyed in the 1906 earthquake and fire.

The Cathedral, Diocesan House, and Cathedral House form a group of period-revival buildings on the project site. The Cathedral is a relatively large-scale presence in the site vicinity, compared with the overall scale of surrounding development. Grace Cathedral, Huntington Park to the east of the project site, and nearby buildings such as the Pacific Union Club, Fairmont Hotel and Mark Hopkins Hotel further east of the site, contribute to the unique visual character of the summit of Nob Hill.

The neighborhood surrounding Grace Cathedral is characterized by a mixture of building types and styles dating from the late 19th century to the present. To the east of the Cathedral, across Huntington Park, is the three-story, dark-colored Beaux-Art style Pacific Union Club, which was built in 1886 and is set back from the surrounding streets on all four sides. The light-toned Renaissance-Revival style Fairmont Hotel, which was built in 1902 and rebuilt in 1906 after the earthquake and fire, lies further to the east across Mason Street. To the south of the Fairmont, across California Street, is the Mark Hopkins Hotel, which was built in 1927. To the south of the Cathedral, across California Street, is the modern Masonic Memorial Temple (Masonic Auditorium) building. The remaining area surrounding the Cathedral site is occupied by a mixture of small residential buildings and large apartment buildings and several parking garages, built to property lines and ranging in height from three to twenty or more stories. The architectural styles of these apartment buildings range from French Second Empire and Art Deco to the International style. Most of the smaller apartment buildings are typical San Francisco structures built during the early 20th century and are characterized by bay windows, pitched or flat roofs, and wood, stucco, or brick exteriors. Most of the high-rise apartment buildings along California, Jones, and Sacramento Streets are in the modern



International style, with a few older high-rise apartment buildings in French Baroque and Art Deco styles.

The primary public views currently available in the vicinity of the project site include views of the City and the Bay in several directions, from public streets near the site. The heights of surrounding buildings limit views outside of these streets. Grace Cathedral, the Cathedral House and Diocesan House are visible from Huntington Park, across Taylor Street to the east of the site. Structures on the project site are also visible from residential development immediately adjacent to the site, on the north and west. The Cathedral is a visual landmark in longer-range views.

#### **D. SHADOW**

Existing buildings on the project site and other buildings in the surrounding area cast shadows on streets, sidewalks, and parks in the project vicinity. Existing and project-related shadow patterns for various times of the day and year are discussed in detail in Chapter IV, Environmental Impacts, pp. 54 to 66.

#### **E. TRANSPORTATION**

The Grace Cathedral site is served principally by local and transit preferential streets. Access to the existing on-site parking lot is from Sacramento Street. In the vicinity of the project site, California, Sacramento, Clay, Washington, Powell and Hyde (north of California Street) are designated in the *San Francisco Master Plan* as Transit Preferential Streets, on which priority is given to transit vehicles over autos during commute and business hours on weekdays. Pine and Bush Streets are designated as Major Thoroughfares ("Primary Vehicular Streets" in the *Downtown Plan*, an area plan of the *Master Plan*) which are defined as "cross-town thoroughfares whose primary function is to link districts within the City and to distribute traffic from and to the freeways."1/

#### **ROADWAY NETWORK**

Bordering the site, California Street is a four-lane, two-way street, running east/west with two lanes in each direction. Sacramento Street is a one-lane, one-way street running in the westbound direction. Taylor Street is a two-lane, two-way north/south street north of California Street; south of California Street, Taylor Street becomes a two-lane, one-way northbound street. Jones Street is a two-lane, two-way north/south street north of California Street; it is a two-lane,

one-way southbound street south of California Street. See Figure 21, p. 70, for the street network within a two-block area of Grace Cathedral.

Freeway access from the East Bay is provided by the Bay Bridge via a number of alternative routes including the Fremont Street exit to Fremont Street, which becomes Front Street north of Market Street, to California Street to Grace Cathedral. The Bay Bridge may be reached via California Street to Battery Street to the First Street on-ramp. Freeway access from the Peninsula is provided also via numerous routes including U.S. 101 to the Mission/Van Ness exit, to Van Ness Avenue north, to California Street. Access to the Peninsula may be reached via California Street to Van Ness Avenue to the U.S. 101 on-ramp. Freeway access to and from the North Bay is via the Golden Gate Bridge and Doyle Drive, Richardson/Lombard, and Van Ness Avenue to California Street.

#### TRANSIT SERVICE

Grace Cathedral is served directly by MUNI bus and cable car lines. Other transit services are available via a connecting MUNI line. There are two MUNI bus routes (1-California and 27-Bryant) that have bus stops within two blocks of the site. Other MUNI Express buses (1X, 31X, and 38X) run on Bush and Pine Streets, but do not stop in the immediate vicinity of the project. There are three cable car lines with stops within the two block area of the Cathedral (California, Powell-Hyde and Powell-Mason). The California cable car has a stop at the intersection of California and Taylor Streets. Figure 21 on p. 70 shows the transit routes in the project area.

The 1-California bus operates between Drumm Street and Geary Boulevard (at 33rd Avenue); the 27-Bryant bus operates between Army/Mission Streets and Van Ness Avenue/Jackson Street; the California cable car operates on California Street between Market Street and Van Ness Avenue; the Powell-Hyde and Powell-Mason cable cars operate between Market/Powell Streets and Fisherman's Wharf at Beach Street and Bay Street, respectively.

Regional transit service to and from the Cathedral area from the East Bay is provided by BART by transferring from BART to MUNI's Powell Street Cable Car at the Powell Street BART Station or the California Cable Car at the Embarcadero BART Station at Market Street. Transit access to the North Bay is provided via a transfer from Golden Gate Transit Bus at the California Street/Van Ness Avenue intersection to the California Street Cable Car. Transit service from the Peninsula is more circuitous with access provided by either CalTrain to 4th/Townsend Street,

transferring to MUNI's 42-Downtown Loop route and then another transfer to the 1-California route on Battery Street in the Financial District; via SamTrans bus to the Daly City BART station, then transfer to MUNI's Powell Street Cable Car line at the Powell Street BART Station; or via SamTrans to the Transbay Terminal, then a walk to the California cable car at Market/California Street.

#### PARKING

Grace Cathedral currently has a 65-space surface parking lot, with access via a one-lane driveway on Sacramento Street. An inventory of existing on-street parking supply within two blocks of Grace Cathedral indicates a total of about 1,515 legal parking spaces on weekday evenings and about 1,495 legal parking spaces on Sunday morning. There are approximately 20 fewer spaces on Sunday mornings than weekday evenings because of different parking regulations that are in effect on one block on Sunday mornings. An inventory of public off-street parking facilities in this same two-block area indicates that there are 930 off-street stalls, on weekday evenings and on Sunday mornings./2/

On a typical Tuesday evening, the evening that Cathedral facilities consistently are used by the largest number of people, the on-street parking space occupancy rate in the study area was found to be about 101 percent. The 65-space Grace Cathedral parking lot was observed on the same evening to be about 109 percent occupied. Off-street parking occupancy during the weekday evening surveyed was about half full, with about 460 available spaces. On a typical Sunday morning during Cathedral services, on-street parking space occupancy was found to be about 99 percent. The 65-space Grace Cathedral parking lot was observed to be 100 percent occupied on Sunday morning. Public off-street parking spaces within the study area had an occupancy rate of about 47 percent, leaving about 490 public off-street spaces available for use./3/

#### PASSENGER LOADING ZONES

Observations were made on Tuesday, April 7, 1992, between 4:30 p.m. and 5:30 p.m. and between 7:00 p.m. and 9:00 p.m. of the two passenger loading zones in the vicinity of Grace Cathedral. One zone is on Jones Street, fronting the School for Boys entrance. This passenger loading zone contains three parking spaces. No conflicts with street traffic were observed./4/ This zone is primarily used to drop off and pick-up children at the school. According to the school staff, approximately 50 vehicle dropoffs, representing approximately 100 students and 100 vehicle trip ends (vte), occur in the morning between 7:45 a.m. and 8:15 a.m. Students are later picked up between 2:15 p.m. and 3:30 p.m.; fewer are picked up than dropped off because



some students remain at school at the school's childcare center to be picked up later./5/ School staff indicated that on a typical school day, the operation of the passenger loading zone works efficiently and creates no conflicts with traffic on Jones Street./6/ The second passenger loading zone is on the south side of California Street, at the Masonic Parking Garage, directly across the street from the main Cathedral building. This zone contains eight parking spaces. It was also observed that, although the spaces are designated loading zones, most of these spaces were occupied by illegally parked cars./4/

#### PEDESTRIAN MOVEMENTS

During the weekdays, primary pedestrian routes to the Cathedral and Cathedral House are California Street and Taylor Street near its intersection with California Street. The main entrances to the Cathedral are at its east side, and the main entrances to the Cathedral House are at its west side facing the Cathedral and at 1011 Taylor Street at its east side. The main entrance for the School for Boys fronts Sacramento Street. The main entrance to the Diocesan House is located at 1215 Taylor Street and the main pedestrian route to this building is via Sacramento Street./5/

During the weekday evening, pedestrian routes vary. Access to the Cathedral is at the side entrances at 1132 California Street and at doors facing the existing parking lot. Entrances to the other buildings on the site remain as noted above./5/

On Sunday mornings, access to the Cathedral includes the main entrances facing Taylor Street and two side entrances on California Street. Access to the Cathedral House and Diocesan House remain the same as during the week. The School for Boys is closed on Sundays, so no entrances or pedestrian routes were identified./5/

Observations made at the California/Taylor Street intersection indicate that pedestrians most frequently use the crosswalk on the north side of California Street, crossing Taylor Street, and few conflicts with motorists were observed./4/

#### NOTES - Transportation

/1/ San Francisco Department of City Planning, *Transportation, an Element of the Master Plan*, June 1982 (as amended).

/2/ Inventories of public on-street and off-street parking spaces were conducted by Environmental Science Associates, Inc. on December 12, 13, and 15, 1991. Results are

summarized and tabulated and are available for public review in the project case file at the Department of City Planning, 450 McAllister Street, San Francisco.

- /3/ Surveys of on-street and off-street parking occupancy were conducted by Environmental Science Associates, Inc. on Sunday morning, December 15, 1991 between 8:00 a.m. and 12:00 noon and Tuesday evening, December 17, 1991 between 7:00 p.m. and 9:00 p.m. Results are summarized and tabulated and are available for public review in the project case file at the Department of City Planning, 450 McAllister Street, San Francisco.
- /4/ One-hour traffic observations were made by Environmental Science Associates on Sunday morning, April 5, 1992 between 9:00 a.m. and 11 a.m.; Tuesday afternoon, April 7, 1992 between 4:30 p.m. and 5:30 p.m.; and Tuesday evening, April 7, 1992 between 7:00 p.m. and 9:00 p.m. at California/Taylor, California/Jones, Sacramento/Taylor, and Sacramento/Jones Street intersections.
- /5/ Information provided by Grace Cathedral, letter, April 9, 1992 from Sarah Rockwell, attorney for Grace Cathedral, to Environmental Science Associates, Inc. Actual pedestrian counts were not taken.
- /6/ Rev. Malcolm H. Manson, Canon Headmaster of the Cathedral School for Boys, telephone conversation, June 5, 1992 and June 29, 1992.

#### IV. ENVIRONMENTAL IMPACTS

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An application for environmental evaluation of the project was filed on March 18, 1991. On January 9, 1992, on the basis of an Initial Study, the Department of City Planning, Office of Environmental Review, determined that an Environmental Impact Report (EIR) was required. Issues determined as a result of the Initial Study to require no further environmental analysis included: Land Use, Views, Glare, Population / Housing / Employment, Noise, Air Quality, Utilities / Public Services, Biology, Geology / Topography, Water Quality, Energy / Natural Resources, and Hazards. Therefore, this document does not discuss these topics (see Appendix A, pp. A.1-27, for the Initial Study). A discussion of Land Use setting and Urban Design are included in the EIR to provide an informational context for better understanding of impacts of the project.

##### A. ARCHITECTURAL, HISTORIC AND CULTURAL RESOURCES

##### ARCHITECTURAL AND HISTORIC RESOURCES

The entirety of the Cathedral Close (Grace Cathedral and the area around it), excluding the Cathedral House and the existing parking lot, is designated City Landmark No. 170. The

- Cathedral Close appears to be eligible for listing on the National Register of Historic Places as a historic district. The Cathedral, Cathedral House, Diocesan House, and Crocker Fence are "contributing structures" within this district (i.e., they contribute to the district's overall significance). Additionally, the Crocker Fence appears to be individually eligible for National Register listing as a rare survivor of the 1906 earthquake and fire. Grace Cathedral received the highest rating of "5" in the 1976 Department of City Planning (DCP) Architectural Inventory. Both the Cathedral House and the Diocesan House were rated "3" in the DCP Inventory. Neither the Cathedral School for Boys building nor the Crocker Fence were rated by this inventory. The Cathedral and Cathedral House are identified in the book *Here Today*. These structures, the DCP Inventory, and *Here Today* are described in detail in Chapter III, Environmental Setting, pp. 33-43. The project site is within the secondary survey area of the architectural inventory conducted by the Foundation for San Francisco's Architectural Heritage. The Heritage inventory is described in the book *Splendid Survivors*. Heritage has not completed ratings for buildings
- which are within the secondary survey area as described in *Splendid Survivors*, p. 227. The Foundation for San Francisco's Architectural Heritage has not surveyed the crest of Nob Hill, or assigned ratings to buildings in that secondary survey area.



The proposed project would remove approximately 130 linear feet of the Crocker Fence that partially surrounds the Cathedral property, demolish the existing Cathedral House and the existing stairs to the Cathedral, eliminate the courtyard between the Cathedral and Cathedral House, and eliminate the 65-space surface parking lot. The project would include construction of

a three-story Chapter House and landscaped courtyard to the north of the Cathedral, a four-story addition to the east side of the Cathedral School for Boys, a one-story addition to the School's north side, and a new grand staircase from Taylor Street to the main doors of the Cathedral. The existing Diocesan House and Cathedral itself would remain unchanged.

The Crocker Fence is included in City Landmark No. 170. It is not rated by the 1976 DCP

- Inventory, and is not mentioned in *Here Today*. The SHPO has determined that the fence appears to be eligible for listing on the National Register of Historic Places both individually and as a contributing structure within a historic district. The Crocker Fence originally surrounded nearly the entire block, except for the northwest portion where the Cathedral School for Boys is now located. The fence was originally approximately 1,150 feet long. Approximately 490 linear feet remain. To accommodate the proposed new staircase to the main Cathedral entrance and the entrance to the subsurface parking garage, approximately 130 linear feet of the Crocker Fence (about 10 percent of the original length of the fence and about 30 percent of the surviving length of the fence) would be removed from the Taylor Street frontage of the site. Approximately 90 linear feet of the removed fence would be relocated to the northern side of the Cathedral, at the
- south side of the proposed landscaped courtyard. Almost all of the remaining 40 linear feet of the removed fence would consist of individual segments of relatively short lengths; these segments would be relocated to currently unidentified areas of the project site. The portion of the Crocker Fence that would be removed is shown on Figure 2, p. 17; the area to which the 90-foot portion of the removed fence would be relocated to is shown in plan view on Figure 3, p. 18. Removal of a portion of the fence would significantly impact the Landmark Cathedral Close. While a portion of the removed fence would be relocated to the proposed courtyard at the interior of the site, relocation of the fence to that area would not preserve the fence in its original location as a marker of the Crocker Mansion.

The Cathedral House was rated "3" in the 1976 DCP Inventory. The Cathedral House is not

- included in City Landmark No. 170. The State Historic Preservation Officer (SHPO) has determined that the Cathedral House appears to be eligible for listing on the National Register of Historic Places as a contributing structure within a historic district./a/ The Cathedral House would be demolished to allow construction of the new staircase and garage/under-stair area.

Proposed alterations to the Cathedral Close, including the removal of the Cathedral House, a Tudor-Revival style structure, and the construction of the Chapter House and school additions, which would be designed in a Gothic-Revival style similar to the style of the existing Diocesan

- House, would change the overall configuration of the Close, and could affect the eligibility of the

historic district for listing on the National Register of Historic Places. The complete front facade and main doors of Grace Cathedral would be visible along Taylor Street and from Huntington Park across Taylor Street from the site and other near views. The new Chapter House and existing Diocesan House would form a Gothic Revival-style foreground along Sacramento Street for the Cathedral, in place of the existing surface parking lot on the site.



As noted in Chapter III, Environmental Setting, the Cathedral House was completed in 1912 in accordance with Bodley's 1907 plan for the Cathedral Close which envisioned the main entrance of the Cathedral facing California Street with the Cathedral House alongside. Subsequent plans for the cathedral property, completed in 1926 by Lewis Hobart, reoriented the Cathedral to face Taylor Street, and assumed the demolition of the Cathedral House to make way for a staircase to the Cathedral's main entrance. The completion of the 1926 plan by Lewis Hobart would also require the removal of a portion of the Crocker Fence along Taylor Street, as noted above.

- Removal of a portion of the Crocker Fence and demolition of the Cathedral House would be considered a significant environmental effect of the proposed project since the fence is part of a designated local landmark and the SHPO has determined that both structures appear eligible for listing on the National Register of Historic Places as part of a historic district. Implementation of these and other components of the proposed project could affect the eligibility of the historic district for listing on the National Register. While the combined effects of the components of the project other than removal of the fence (demolition of the Cathedral House, construction of a new staircase, construction of the Chapter House, additions to the Cathedral School for Boys, creation of new open space and subsurface parking and meeting rooms) would impact architectural and historic resources, these impacts, in light of the above discussion, would not be considered significant environmental impacts.

#### CULTURAL RESOURCES

An archaeological study was prepared for the project site and is on file at the Department of City Planning./1/

The proposed project would involve excavation to a depth of around 30 feet at the location of the new garage, and would also result in site disturbance related to additional construction and demolition activities. Areas of the site have been disturbed by construction activities in the past, including activities associated with the Crocker Mansion and auxiliary structures, and the existing buildings on the site. Some limited areas and some lower depths may have remained undisturbed by these activities.

The archival research conducted for the project site shows no record of Native American habitation or prehistoric cultural resources at the site, although the absence of documentation does not eliminate the possibility that prehistoric remains might be located in the area. Past experience indicates that the depth of the proposed excavation decreases the reliability of existing

methods used to predict the presence of archaeological resources. The presence of deeply buried prehistoric deposits in the intensively developed South of Market area suggests that other, unrecorded archaeological deposits of similar, or even earlier age, may exist in various places throughout San Francisco. The amount of excavation proposed, in terms of depth and area, also increases the likelihood that the project could adversely impact archaeological resources, should they exist on the site.

Regarding the potential for historic artifacts, dwellings from the Gold Rush era may have been located on the site. Any subsurface features excavated during that period, such as privies, trash pits, and perhaps wells, may still exist within the confines of the project site, and might be encountered during excavation for the project. In addition, there is a possibility that later nineteenth century cultural resources associated with the cottages of the late 1850s, and with the Crocker Mansion would be encountered on the site.

NOTE - Architectural, Historic and Cultural Resources

- /a/ The Cathedral Close may also be eligible for listing on the California Register. Pursuant to Assembly Bill 2881 (Frazee), resources that are listed or formally determined eligible for listing on the National Register of Historic Places by the Keeper of the Register are automatically listed on the California Register of Historical Resources, which was established by the same legislation.
- /1/ Allen G. Pastron, Ph.D., President, Archeo-Tec, *Cultural Resources Evaluation of the Grace Cathedral Project, San Francisco, CA, October 1991*. A copy of this report is on file at the Department of City Planning, 450 McAllister Street, San Francisco.

**B. URBAN DESIGN AND VISUAL QUALITY**

The project would include the construction of a three-story Chapter House, a four-story addition to the east side of the Cathedral School for Boys, a one-story addition to the School's north side, and a new staircase from Taylor Street to the main doors of the Cathedral. The project would also include the construction of a landscaped courtyard to the north of the Cathedral, above a subsurface parking garage.

The proposed project would include the demolition of the existing Cathedral House and the existing stairs to the Cathedral, elimination of the 65-space surface parking lot, removal of a portion of the Crocker Fence along Taylor Street, and the removal of the existing paved open space area between the Cathedral and the Cathedral House, as well as some landscaping. Approximately 130 linear feet of the 490-foot-long Crocker Fence would be removed from the Taylor Street frontage of the site to accommodate the project. Approximately 90 linear feet of the removed fence would be relocated to the center of the site at the northern side of the Cathedral, on the south side of the proposed landscaped courtyard. The fence would be incorporated as a design feature of the courtyard.



Access for on-site parking would be relocated to Taylor Street from its present location on Sacramento Street. The existing Diocesan House and Cathedral itself would remain unchanged.

The Chapter House, which would front Sacramento Street, would be designed in a Gothic-Revival style similar to the style of the existing Diocesan House. The Chapter House would have walls of cast-in-place concrete, and a slate tile roof in a color intended to blend with the

slate tile roof of the Diocesan House. The proposed four-story additions to the Cathedral School for Boys would be designed in the same architectural style as the proposed Chapter House, and would also have walls of cast-in-place concrete with a slate tile roof in a color intended to blend with that of the Diocesan House. The Chapter House and the additions to the Cathedral School for Boys are intended to be compatible with existing structures on the site and similar in scale to existing structures on the site and to structures across Sacramento Street from the project site.

The project would change the configuration of the existing Cathedral Close. The Cathedral House would not occupy the foreground of the site on Taylor Street. The complete front facade and main doors of Grace Cathedral would be newly visible along Taylor Street, and from Huntington Park across Taylor Street from the site. Views from Huntington Park would incorporate the Cathedral on the left, the new staircase, the entrance to the gift shop and crypt-level meeting spaces, the driveway to the parking garage, and the existing Diocesan House. The Chapter House, Diocesan House, and additions to the Cathedral School would form a Gothic-Revival-style foreground along Sacramento Street for the Cathedral, in place of the existing surface parking lot on the site, would block some views of the cathedral from the north, and change the visual character of Sacramento Street. The Chapter House and proposed landscaped courtyard would replace the existing surface parking lot and some landscaping, and the existing open space area would be replaced by the proposed stairway to the main Cathedral entrance.

### C. SHADOW

Open space in the project vicinity includes Huntington Park, immediately east of the project site across Taylor Street; the Chinese Recreation Center, northeast of the project site at the intersection of Mason and Washington Streets; and the landscaped area at the California Street frontage of the Pacific Union Club between Mason and Cushman Streets. Proposed publicly-accessible private open space includes the landscaped courtyard proposed for the project site (see Figure 3, p. 18). Open spaces in the vicinity of the project that are protected by Proposition K, the Sunlight Ordinance (Section 295 of the *City Planning Code*), include Huntington Park and the Chinese Recreation Center. Because structures proposed as part of the project would not exceed 40 feet in height, the requirements of Section 295 would not apply to the proposed project. The shadow impacts of the project on these open spaces are reported, however, for informational purposes.

Shadow patterns for existing buildings on site and in the project area (including the Cathedral House, proposed for removal) and for the project are shown for 10:00 a.m., noon and 3:00 p.m.

for the four seasons: during the winter and summer solstices when the sun is at its lowest and highest (December 21 and June 21, respectively), and during the spring and fall equinoxes when the sun is at its midpoint (March 21 and September 21, respectively; see Figures 15 to 18 on pp. 56-59. Conditions from June 21 through December 21 closely mirror the conditions from December 21 through June 21 (using solar time). The analysis includes shadows cast on streets, sidewalks, pedestrian areas, and open spaces in the area potentially affected by the project.

##### DECEMBER 21 (PST)

At 10:00 a.m. Pacific Standard Time (PST) on December 21 (see Figure 15, p. 56), the proposed Chapter House would add shadow to Sacramento Street west of Taylor Street, including approximately 50 feet of the north sidewalk, and approximately 60 feet of the south sidewalk. At noon, the Chapter House would add shadow to Sacramento Street west of Taylor Street, including approximately 20 feet of the north sidewalk. At 3:00 p.m., shadow from the Chapter House would be within shadows from existing buildings and there would be no new shadow.

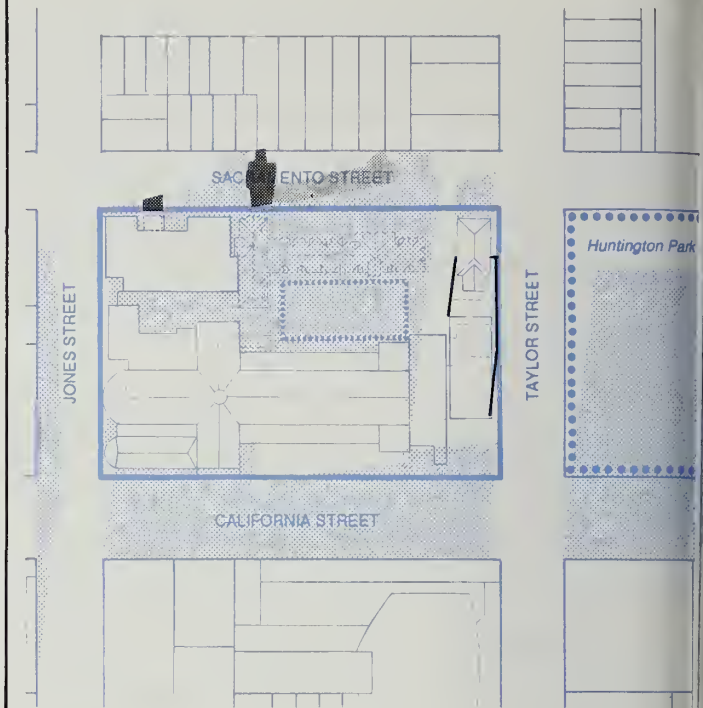
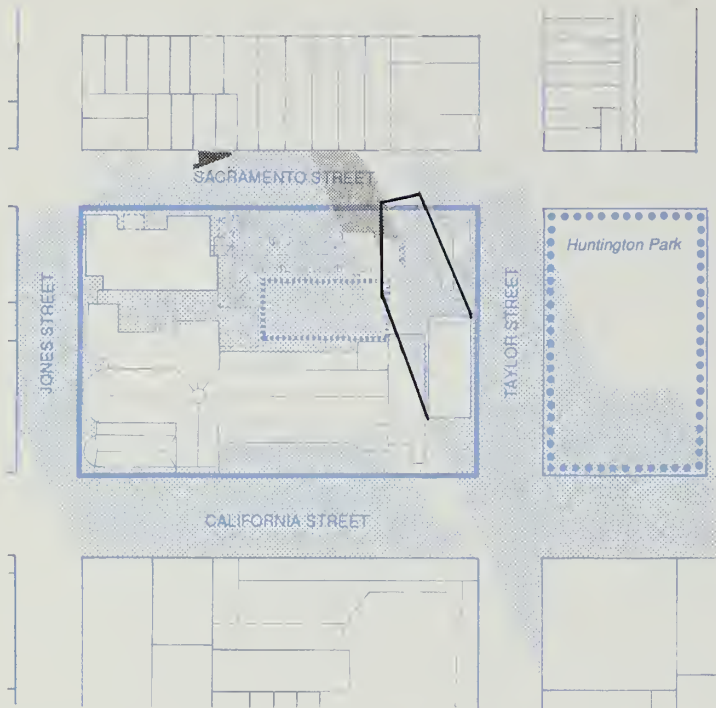
The eastern addition to the Cathedral School for Boys would shade Sacramento Street east of Jones Street at 10:00 a.m., including approximately 40 feet of the north sidewalk; shadow from the northern addition would be within existing shadow from the Cathedral. At noon, the eastern addition would shade a portion of Sacramento Street between Taylor and Jones Streets, including approximately 10 feet of the north sidewalk and approximately 20 feet of the south sidewalk; the northern addition would shade approximately 30 feet of the south sidewalk of Sacramento Street just east of Jones Street. At 3:00 p.m., shadow from the additions to the school would be within shadows from existing buildings.

Under existing conditions at 10:00 a.m., the Cathedral House shades portions of the existing surface parking lot and approximately 30 feet of the south sidewalk of Sacramento Street. At noon this building shades portions of the project site between the Cathedral House and the Diocesan House and approximately 110 feet along the west sidewalk of Taylor Street between California and Sacramento Streets. Shadows cast by the Cathedral House at 3:00 p.m. are within shadows cast by other existing buildings. The removal of the Cathedral House would eliminate these existing shadow effects.

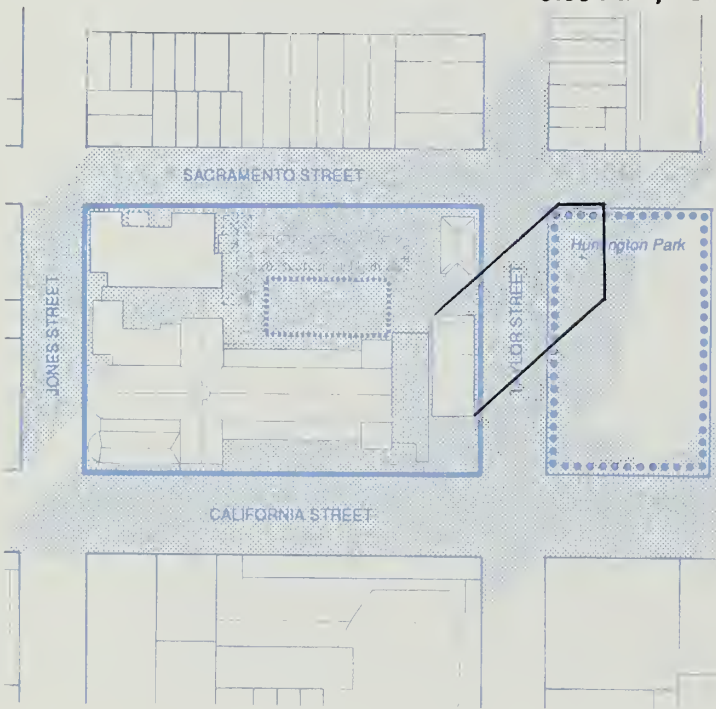









10:00 A.M., PST

NOON PST



3:00 P.M., PST



-  Existing Shadow
-  New Project Shadow - Chapter House
-  New Project Shadow - Additions to Cathedral School for Boys
-  Outline of Shadow from Existing Cathedral House (unshaded portion within outline represents shadow to be eliminated)
-  Project Site Boundary
-  Existing Public Open Space
-  Proposed Open Space



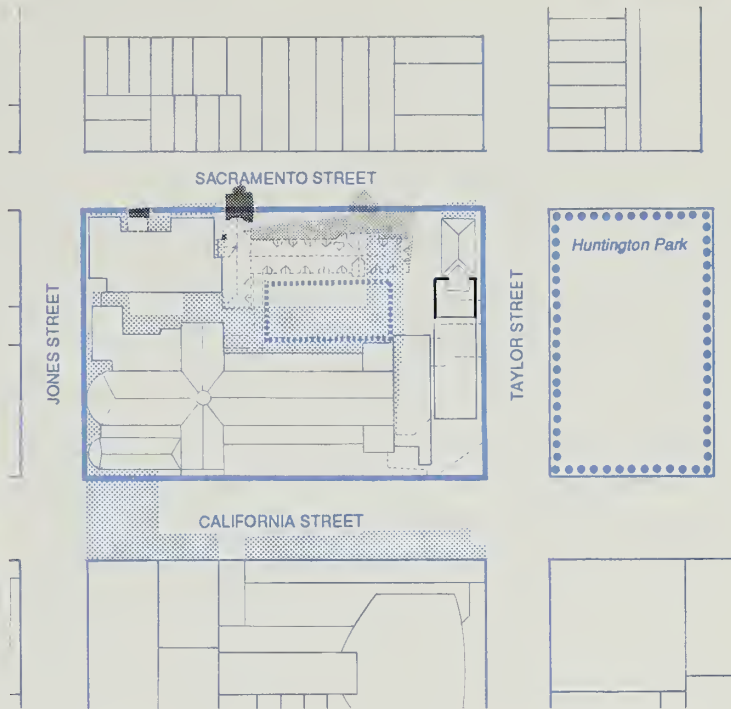
SOURCE: Environmental Science Associates, Inc.

Grace Cathedral

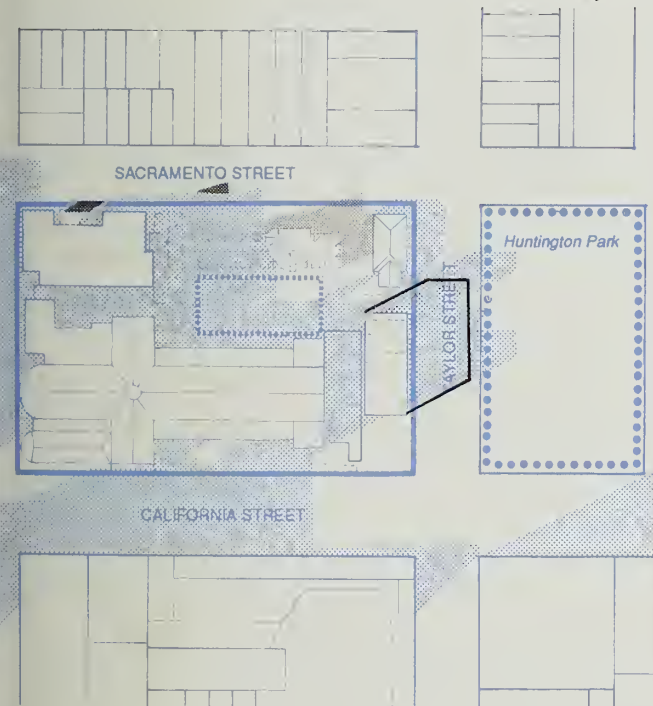
**Figure**  
Project Shadow Pattern  
December








10:00 A.M., PST

NOON PST



3:00 P.M., PST

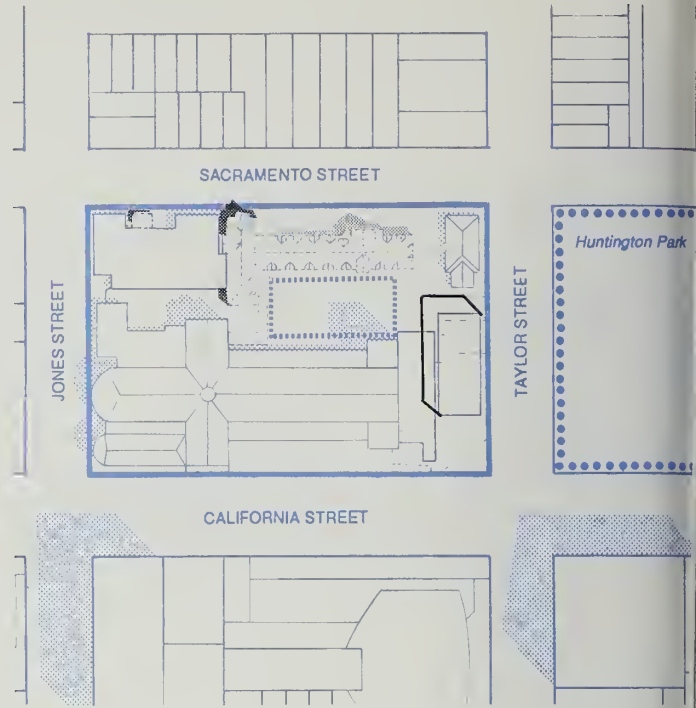
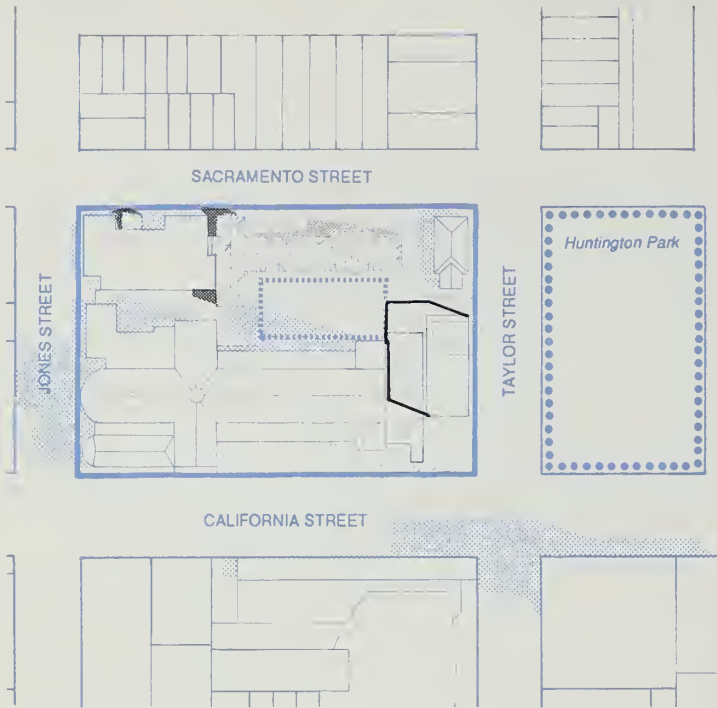


-  Existing Shadow
-  New Project Shadow - Chapter House
-  New Project Shadow - Additions to Cathedral School for Boys
-  Outline of Shadow from Existing Cathedral House (unshaded portion within outline represents shadow to be eliminated)
-  Project Site Boundary
-  Existing Public Open Space
-  Proposed Open Space

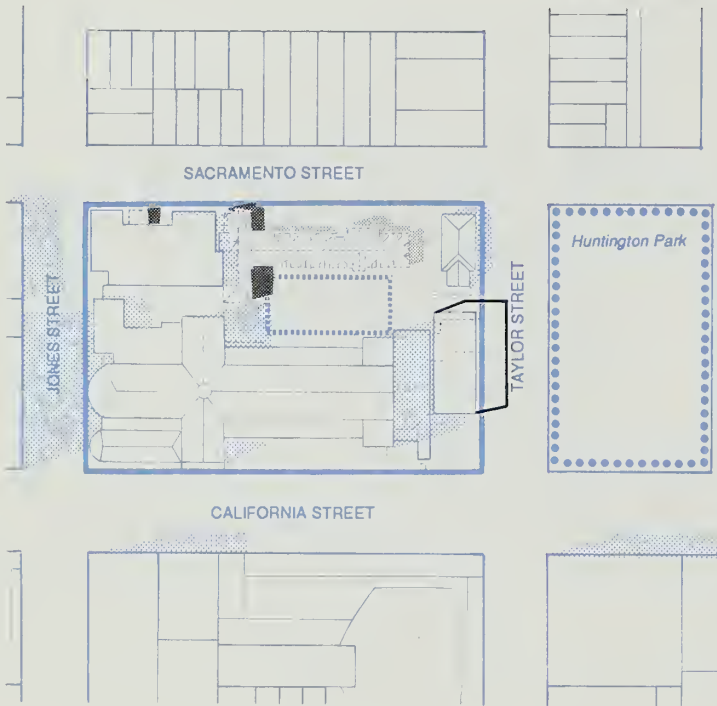









10:00 A.M., PDT

NOON PD



3:00 P.M., PDT



-  Existing Shadow
-  New Project Shadow - Chapter House
-  New Project Shadow - Additions to Cathedral School for Boys
-  Outline of Shadow from Existing Cathedral House (unshaded portion within outline represents shadow to be eliminated)
-  Project Site Boundary
-  Existing Public Open Space
-  Proposed Open Space



SOURCE: Environmental Science Associates, Inc.

Grace Cathedral

**Figure**  
Project Shadow Pattern  
June

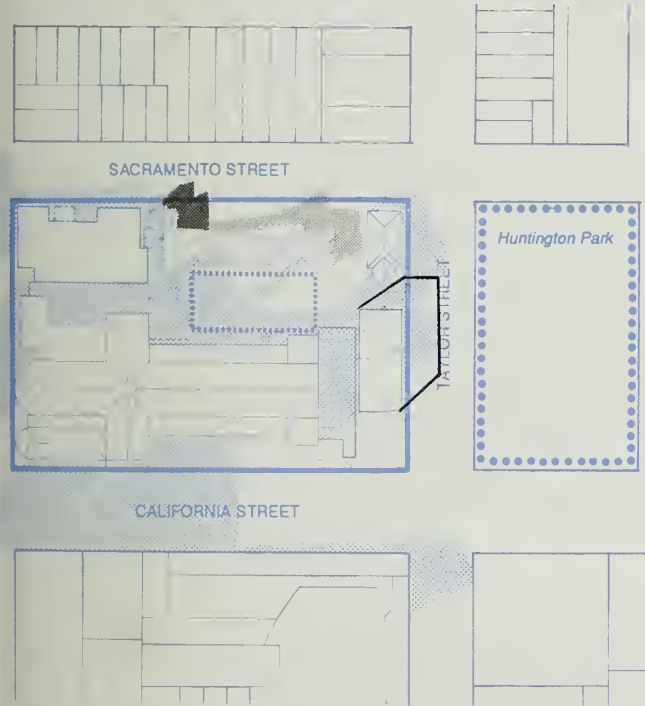









10:00 A.M., PDT

NOON PDT



3:00 P.M., PDT



-  Existing Shadow
-  New Project Shadow - Chapter House
-  New Project Shadow - Additions to Cathedral School for Boys
-  Outline of Shadow from Existing Cathedral House (unshaded portion within outline represents shadow to be eliminated)
-  Project Site Boundary
-  Existing Public Open Space
-  Proposed Open Space



## MARCH 21 (PST)

At 10:00 a.m. PST and noon on March 21 (see Figure 16, p. 57), the proposed Chapter House would shade approximately 30 feet of the south sidewalk of Sacramento Street west of Taylor Street. At 3:00 p.m., shadow from the Chapter House would shade portions of approximately 40 feet of the south sidewalk.

The eastern addition to the Cathedral School for Boys would shade Sacramento Street east of Jones Street at 10:00 a.m., including approximately 40 feet of the south sidewalk; shadow from the northern addition would shade an additional approximately 30 feet of this sidewalk. At noon, the two additions would shade two separate portions of approximately 30 feet each of the south sidewalk of Sacramento Street. At 3:00 p.m., shadow from the eastern addition would shade Sacramento Street, excluding sidewalks, while the northern addition would add approximately 30 feet of shading to the south sidewalk of Sacramento Street.

Under existing conditions at 10:00 a.m., the Cathedral House currently shades portions of the existing surface parking lot and areas between the Cathedral House and the Cathedral and the Diocesan House. At noon the Cathedral House shades the area between it and the Diocesan House. At 3:00 p.m. the Cathedral House shades Taylor Street, including approximately 10 feet of the west sidewalk north of California Street. The removal of the Cathedral House for the proposed grand stairway would eliminate these existing shadow effects.

## JUNE 21 (PDT)

At 10:00 a.m. Pacific Daylight Time (PDT), noon, and 3:00 p.m. on June 21 (see Figure 17, p. 58), shadows from the proposed Chapter House would be within the project site, shading only those areas immediately adjacent to the north of the proposed building; at 3:00 p.m. a portion directly east of the building would be shaded. No other new shading would occur at these times as a result of this building.

Shadows from the proposed eastern addition to the Cathedral School for Boys would fall within the project site at 10:00 a.m. and at 3:00 p.m., shading up to approximately 10 percent of the proposed courtyard at 3:00 p.m. At noon, the eastern addition would shade approximately 20 feet of the south sidewalk of Sacramento Street east of Jones Street. Shadow from the northern addition would fall within the project site at these times.

Under the existing conditions, the Cathedral House currently shades interior portions of the project site between the Cathedral House and the Cathedral and the Diocesan House at 10:00 a.m. and noon. At 3:00 p.m., the Cathedral House shades Taylor Street, including approximately 120 feet of the west sidewalk between California and Sacramento Streets. The removal of the Cathedral House would eliminate these existing shadow effects.

#### SEPTEMBER 21 (PDT)

At 10:00 a.m. PDT on September 21 (see Figure 18, p. 59), the proposed Chapter House would shade Sacramento Street, including approximately 40 feet of the south sidewalk between Jones and Taylor Streets. At noon and at 3:00 p.m., this building would shade Sacramento Street, including approximately 30 feet of the south sidewalk.

At 10:00 a.m. and noon, the eastern addition to the Cathedral School for Boys would shade Sacramento Street, including approximately 40 feet of the south sidewalk east of Jones Street; the northern addition would shade an additional approximately 30 feet of this sidewalk near Jones Street at these times. At 3:00 p.m., the eastern addition would shade approximately 50 feet of the south sidewalk of Sacramento Street, while shadow from the northern addition would be within shadows from existing buildings.

Under existing conditions at 10:00 a.m., the Cathedral House currently shades portions of the existing surface parking lot and areas between the Cathedral House and the Cathedral and the Diocesan House. At noon, the Cathedral House shades areas between it and the Cathedral and the Diocesan House. At 3:00 p.m., the Cathedral House shades Taylor Street between California and Sacramento Streets, including two separate sections, approximately 10 to 30 feet each, of the west sidewalk. The removal of the Cathedral House would eliminate these existing shadow effects.

#### THE SUNLIGHT ORDINANCE

In June 1984, the voters of the City and County of San Francisco approved Proposition K, the Sunlight Ordinance (*City Planning Code* Section 295). This ordinance prohibits the issuance of building permits for structures that would shade property under the jurisdiction of, or designated to be acquired by, the Recreation and Park Commission, unless the City Planning Commission determines that such shade would have an insignificant adverse impact on the use of such property. In February 1989, the City Planning and Recreation and Park Commissions adopted



shadow criteria for all 15 parks in the Greater Downtown Area. These districts have the greatest potential for new shadow on parks because of the permitted height limits. The commissions: 1) set an Absolute Cumulative Limit for new shadow for each open space; 2) (where new shadow is allowable:) projected individual building impacts and allocated a portion of the additional allowable shadow among specific projects, within the Absolute Cumulative Limit; and 3) set forth qualitative criteria for new shadow. For informational purposes, the Absolute Cumulative Limit for Huntington Park is zero percent additional shadow-foot-hours per year. However the Ordinance applies to structures which exceed 40 feet in height. Structures proposed as part of the project would not exceed 40 feet in height measured as allowed by the *City Planning Code*. Therefore, the requirements of Section 295 would not apply to the proposed project. Shadow impacts of the project on the park are described below for the reader's information.

### OPEN SPACE

The shadow studies prepared for the project evaluated project-generated shadows on existing and proposed open spaces in the project vicinity. The Chinese Recreation Center and the landscaped California Street frontage of the Pacific Union Club would not be affected by shadow from the proposed project because of distance and/or intervening buildings that already shadow the open spaces. The shadow studies show that the proposed project would add new shadow to Huntington Park and to the project's proposed landscaped courtyard that would be located between the existing Cathedral and the proposed Chapter House. Shadow effects on these open spaces are discussed in more detail below.

### Huntington Park

Huntington Park is shown in Figure 19. In the late afternoon through much of the year, shadows from the existing Cathedral House reach the central and southern portions of Huntington Park, shading lawn and seating areas in those sections of the park. Shadows from the existing Diocesan House reach northern and central portions of the park, shading lawn and seating areas in those sections of the park, as well as western and central portions of the children's playground in the northern section of the park. Removal of the Cathedral House would eliminate shading of the park by that building.

New shadow from the proposed buildings would be limited to that shadow passing over the existing Diocesan House and/or between the Diocesan House and the main Cathedral building.





Grace Cathedral ■  
**Figure 19**  
Huntington Park:  
View Looking Northeast  
from Center of Park

SOURCE: Environmental Science Associates, Inc.



Areas potentially affected by new shadow include central and eastern portions of the children's playground, and lawn and seating areas in central and eastern sections of the park.

The proposed Chapter House would add shadow to northern and central portions of Huntington Park from early March through mid October. The shading would occur as early as about 4:30 p.m. in March and September and about 7:00 p.m. in June. The proposed eastern school addition would add shadow to central portions of Huntington Park from late March through mid September, starting as early as about 5:00 p.m. in March and September, and about 7:00 p.m. in June. Approximate maximum shading by the proposed buildings would occur in late April to early May and mid to late August at about 7:00 p.m. PDT. Figure 20 shows project shadow on Huntington Park on April 20 at 6:50 p.m., which is representative of approximate maximum project shadow on the park. Maximum shadow cast by the Chapter House by itself would cover approximately ten percent of central portions of the east side of the park, and maximum shadow cast by the eastern school addition by itself would cover approximately ten percent of central portions of the west side of the park. Maximum total new project shadow (i.e., combined, overlapping shadow from both the Chapter House and the eastern school addition) would cover approximately 15 percent of the park. At that time, existing buildings (excluding the Cathedral House) would shade an additional 70 percent, thus resulting in a total of approximately 85 percent shading of the park. About the same extent of shading, 85 percent, occurs at that time under existing conditions with the Cathedral House present. Shadow from the northern school addition would not reach the park at any time.

##### Proposed Landscaped Courtyard

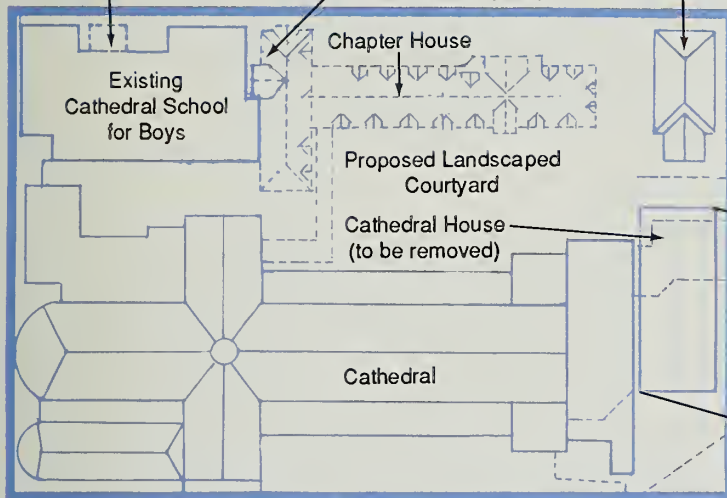
As part of the project, a portion of the existing surface parking lot north of the Cathedral and south of the proposed Chapter House would become a private, publicly-accessible open space area (see Figure 3, p. 18). The open space would generally receive sun exposure in the months of April through August in the late morning and early afternoon. This area is currently partially or totally shaded through much of the year by existing buildings. The Cathedral, for example, would shade the entire proposed open space during noon and afternoon hours from late October through mid February.

The proposed Chapter House would shade portions of the proposed open space from late March through mid September as early as about 5:00 p.m. The proposed eastern school addition would shade portions of the proposed open space throughout the year after about 12:00 p.m.



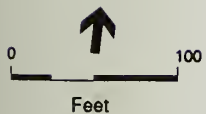
Jones Street







School Addition (north) School Addition (east) Diocesan House



Taylor Street

Huntington Park



-  Existing Shadow
-  New Project Shadow - Chapter House
-  New Project Shadow - Additions to Cathedral School for Boys
-  Outline of Shadow from Existing Cathedral House (unshaded portion within outline represents shadow to be eliminated)
-  Project Site Boundary
-  Existing Public Open Space

**Figure 20**  
Project Shadow on Huntington Park  
April 20, 6:50 p.m., PDT

Approximate maximum project shading would occur around the 21st of May and around the 21st of July at about 6:30 p.m. Separately, maximum shadow cast by the Chapter House would cover approximately 25 percent of the proposed open space area, while maximum shadow cast by the eastern school addition would cover approximately 50 percent of the open space. With both proposed buildings, shadow from the Chapter House would be within the shadow cast by the eastern school addition, resulting in a total of approximately 50 percent coverage by the project. Existing buildings would shade the remaining approximately 50 percent of the open space at that time. Shadows from the northern school addition would not reach this open space.

#### Proposed Open Space Fronting on Taylor Street

An approximately 4,200 square foot open space is proposed for the area east of Grace Cathedral; about half of this open space would be immediately in front of the main entrance to the Cathedral, and half would be above the Taylor Street entrance to the proposed underground garage (see Figure 3, p. 18). The open space would generally receive sun exposure in the months of April through August throughout the day until about 2:00 p.m., as well as year round at about noon. Existing buildings, including Grace Cathedral, would shade portions of this open space at various times through the year. The Cathedral, for example, would shade most or all of the proposed open space from mid September through mid March at about 3:00 p.m.

The proposed Chapter House would shade portions of the proposed eastern open space from early April through late August as early as about 5:00 p.m. The proposed eastern school addition would shade portions of the open space from late March through mid September as early as about 4:00 p.m. Project shadow coverage would primarily affect the area above the entrance to the underground garage. Approximate maximum project shading would occur around the 21st of May and around the 21st of July at about 7:00 p.m. Individually, maximum shadow cast by the Chapter House would cover approximately 25 percent of the proposed open space area, while maximum shadow cast by the eastern school addition would cover approximately 50 percent of the open space. With both proposed buildings, shadow from the Chapter House would be within the shadow cast by the eastern school addition, thus resulting in a total of approximately 50 percent project coverage. At that time, the Cathedral would shade the remaining approximately 50 percent of the open space in front of its main doors. Shadows from the northern school addition would not reach this open space.

## D. TRANSPORTATION

### EXISTING TRAFFIC

On Sunday morning (9:00 a.m. to 11:00 a.m.) April 5, 1992 and Tuesday afternoon (peak hour 4:30 p.m. to 5:30 p.m.) and evening (7:00 p.m. to 9:00 p.m.) April 7, 1992, the peak times for Cathedral activities, traffic operations in the vicinity of Grace Cathedral were observed./1/ Overall, traffic flowed well during these periods. California Street cable cars did not impede traffic, as they appeared infrequently, and few riders were observed boarding or exiting the California Street cable cars at Taylor Street.

Some operational problems (traffic conflicts) were observed at the California/Taylor Street intersection, because it is located on a crest of a hill, and Taylor Street changes lane configuration at the intersection. On the south leg of the intersection, Taylor Street is one-way northbound up the hill to California Street and north of this intersection is a two-way street. The northbound Taylor Street approach is steep, and it appears difficult for drivers on this approach to see the intersection with California Street until they arrive at the intersection, at the top of the hill. In addition, many vehicles were observed to stop at the red traffic signal on northbound Taylor Street within the pedestrian crosswalk, where it is relatively flat. This crosswalk is also difficult for drivers to see as it is narrower than the other crosswalks at this intersection, and about half of the crosswalk lines are either worn away or paved over. The two Taylor Street northbound lanes, south of California Street, change configuration at the Taylor/California Street intersection; the left lane is designated for through and left-turn traffic and the right lane designated for right turns only. To alert motorists of the change in configuration, the signals facing both the northbound and southbound Taylor Street approaches use flashing yellow lights instead of green. When traffic is permitted to proceed, the lights flash a single yellow light, and the signals use a steady double yellow light as the clearance interval before turning red. This atypical use of yellow signal indications appeared to cause some motorists to hesitate entering the intersection. This hesitation caused some motorists to be within the intersection when the light turned green for California Street traffic. Southbound Taylor Street traffic must turn left or right because Taylor Street becomes a one-way street south of California Street. Notwithstanding these conditions, during all periods observed, the operating level of service of this intersection was found to be good.

The California/Jones, Sacramento/Taylor, and Sacramento/Jones intersections were observed to operate without operational problems during the weekday and Sunday times noted./1/



## EXISTING TRAVEL DEMAND

Currently, on weekdays, there are 70 Cathedral and Diocesan House employees/volunteers, 30 school employees and two childcare center employees at the project site. In addition, there are an average of about 80 to 100 visitors, 200 students, and 50 parent volunteers on the premises, for a total of about 450 people on the site over the course of a typical weekday. On a typical Tuesday evening, which is the most heavily attended weekday meeting night, about 500 people are on Cathedral property. Other weekday evenings have less attendance at meetings. During the course of a typical Sunday morning, a total of approximately 850 people attend services held at the Cathedral./2/

A survey of meeting participants on a typical Tuesday evening between 7:00 p.m. and 9:00 p.m., January 7, 1992, provided mode split information. The mode split of meeting attendees traveling to the site was as follows: 30 percent drove alone; 21 percent carpooled; 3 percent arrived by motorcycle; 5 percent arrived by taxi; 13 percent took public transit; less than one percent arrived by bicycle; and 27 percent walked./3/

Using that mode split information, and attendance estimates, vehicle trip-generation characteristics of the Cathedral on a typical Tuesday evening were estimated to be about 486 vehicle trip ends (vte). A vehicle trip end is one vehicle arriving or leaving a destination.

- This estimate equates to about 243 round trips. Meetings on Tuesday evenings start and end at various times, starting at 6:00 p.m., 7:00 p.m. and 8:00 p.m. and ending as early as 7:00 p.m. and as late as 10:00 p.m. The largest attendance on a typical Tuesday evening is for the Downtown Alcoholics Anonymous which meets between 7:00 p.m. and 10:00 p.m. On the basis that attendees arrive up to 30 minutes before their function's start and depart up to 30 minutes after their function's end, about 200 vte occur inbound to the project vicinity between 6:30 p.m. and 7:00 p.m., and about 190 vte occur outbound from the project vicinity between 10:00 p.m. and 10:30 p.m. The Cathedral also generates travel demand from staff and students associated with daytime uses.

## FUTURE TRAVEL DEMAND AND TRAFFIC

The proposed project would increase the number of employees working on the project site by approximately five, which would include two new school employees and one to three parking garage attendants. The project would increase the capacity of meeting space available to community groups, but because the number of evening function attendees on a typical night is

not anticipated to change markedly, a substantial increase in trip generation is not expected. Also, any additional trips to the Cathedral site for evening functions would occur outside the peak periods. An additional 36 students would attend the School for Boys./2/ Travel demand generated by the addition of a maximum of five new employees and 36 new students would not noticeably affect transportation systems in the area.

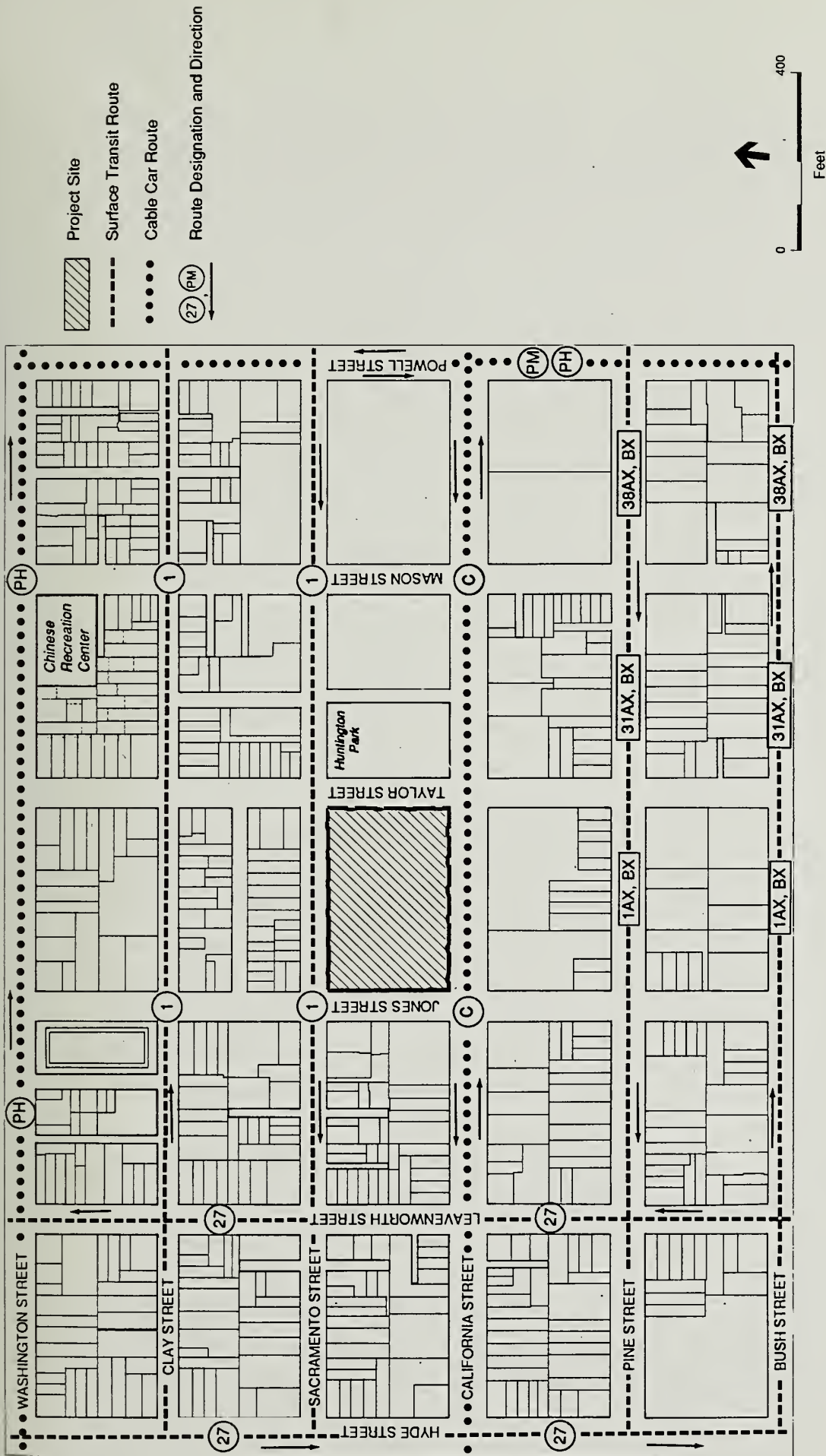
Assuming a conservative estimate that all of the new employees would drive alone to and from work every day, it is estimated that these new employees would add a maximum of about ten trips a day to area streets. Because three of the new employees would be parking garage attendants, it is probable that these employees would not be arriving or leaving work during a.m. or p.m. peak hours. The remaining two employees, teachers at the Cathedral School, could arrive at, and depart from, the area during the peak traffic hours. Based on existing modes of transportation for students to the school, it is estimated that approximately 50 percent of the new students (about 18 students) would be dropped off by car, with an average of two students per vehicle, thereby adding approximately 18 vte during the morning peak period (9 vehicle trips inbound to the site, and 9 vehicle trips outbound from the site after the child is dropped off). An additional 18 vte (9 inbound vehicle trips and 9 outbound vehicle trips) would be added to adjacent streets between 2:15 p.m. and 6:00 p.m., with most of these afternoon trips occurring between 2:15 p.m. and 3:30 p.m. when the majority of the students are picked up. Some students remain after school at the school's childcare center and are not picked up until between 5:00 p.m. and 6:00 p.m./2/

Thus, it is estimated that the project would add a maximum of approximately 20 vehicle trips during the a.m. peak hour, and about two vehicle trips during the p.m. peak hour, to streets in the vicinity of the Cathedral (see Figure 21 for the street network in the vicinity of the project). If some of the new employees did not drive alone or traveled by MUNI to work, these trip rates could be expected to be lower. Because the expected vehicle trips during the p.m. peak period would be very low, it is expected that the new trips would not be noticeable within the daily fluctuations in traffic.

Based on standard Department of City Planning assumptions, the provision of additional on-site parking would not, in and of itself, generate additional vehicle trips. Likewise, information provided by the Cathedral indicates that the increased meeting space capacity proposed as part of the project would not result in a noticeable increase in the size or frequency of events, and would therefore not be expected to generate additional trips. Therefore, additional trips likely to be caused by the project, would be limited to those described directly above.

The project would move access to the Cathedral's on-site parking from Sacramento Street, a one-way transit preferential street, to Taylor Street, a two-way local street on which MUNI buses do not operate (see Figure 21 for transit routes in the project area). The entrance to the proposed parking garage would have two lanes, for entering and exiting vehicles; the existing lot has one lane which is shared by both entering and exiting traffic, which at times may affect the flow of





SOURCE: MUNI San Francisco, Street and Transit Map, 1991

Grace Cathedral

**Figure 21**

Street Network and Transit  
Routes in the Project Area

traffic (including MUNI) on Sacramento Street, a transit preferential street. Relocating the parking entrance to Taylor Street would eliminate the potential impacts of the Cathedral's existing parking lot on Sacramento Street. The proposed two-lane driveway on Taylor Street to the new parking garage would not be expected to result in conflicts between entering and exiting vehicles and traffic on this less traveled street. Also, there were no existing conflicts observed between cable cars and traffic at the California and Taylor Street intersection as noted in Chapter III, Environmental Setting. The relocation of the parking entrance from Sacramento Street to Taylor Street is not expected to create traffic conflicts with cable cars operating on California Street. While the California and Taylor Street intersection is complex, it was observed to operate without operational problems, during the times studied, the peak times for the Cathedral. The complexity of this intersection relates primarily to the south leg, while project traffic is expected mostly on the north leg. The project (including existing traffic diverted from the current parking lot access on Sacramento Street to the proposed parking garage access on Taylor Street) would not be expected to noticeably affect this intersection; the traffic that would approach the intersection on northbound Taylor Street, however, would be expected to continue to infringe on the pedestrian crosswalk at the southern leg of the intersection because of the steep grade on that approach.

#### EXISTING PARKING

Grace Cathedral currently has a 65-space surface parking lot, with access via a one-lane driveway on Sacramento Street. The existing one-lane parking lot driveway may create conflicts with traffic (including MUNI buses) on Sacramento Street as entering vehicles may sometimes stop and wait for an exiting vehicle to clear the driveway before being able to enter the lot, thereby temporarily blocking one lane on Sacramento Street. However, no such driveway conflicts were observed on Sunday morning, April 5, 1992 between 9:00 a.m. and 11:00 a.m.; Tuesday afternoon, April 7, 1992 between 4:30 p.m. and 5:30 p.m.; and Tuesday evening, April 7, 1992 between 7:00 p.m. and 9:00 p.m., which are the peak times for Cathedral activities./1/

On weekday days, Mondays through Fridays, all spaces in the parking lot are reserved for staff of the Cathedral, Diocesan House and the Cathedral School for Boys. On weekday evenings and all day Sunday, no spaces are reserved for Cathedral staff, and all on-site parking spaces are available for public use. On weekday evenings, Tuesday through Friday, the lot is staffed by an attendant, with a fee of \$2.00 for persons using Grace Cathedral facilities and \$5.00 for others. There is no attendant on Monday evenings, because there is one, approximately seven-person meeting regularly scheduled. Meeting attendance on other weekday evenings varies from

approximately 70 people on Fridays to 500 people on Tuesday evenings. On Sundays, the lot is staffed by two attendants between 8:00 a.m. and 1:00 p.m., and a fee of \$1.00 is charged to all parkers, regardless of their destination. A fee of \$2.00 is charged to all parkers on Sunday afternoons after 1:00 p.m./2/



- An inventory of existing on-street parking supply on a weekday evening within two blocks of Grace Cathedral indicates a total of about 1,514 legal parking spaces. This inventory was taken on Thursday, December 12, 1991 between 7:00 p.m. and 9:00 p.m. The study area is bounded by Washington, Hyde, Powell, and Bush Streets. Approximately 95 percent of these spaces are unmetered, and five percent are metered; these metered spaces are free after 6:00 p.m. There are about 1,274 unmetered, residential permit parking district spaces (two-hour parking spaces for non-residents of the permit parking district); 84 unmetered white spaces (passenger loading and unloading); 73 unmetered yellow spaces (loading spaces, available for unrestricted use after 6:00 p.m.); 9 unmetered green spaces (short term parking, ten minutes, available for unrestricted use after 6:00 p.m.); 61 unrestricted metered spaces (free after 6:00 p.m. on weekdays); 10 metered yellow spaces (loading spaces, available for unrestricted use after 6:00 p.m.); and 3 unmetered blue spaces (handicapped parking). A survey of public off-street parking facilities in this same two-block area indicates that there are 930 off-street stalls. The rates for these lots range from \$3.50 to \$6.00 per hour./4/

- ✓ On a typical Tuesday evening, the evening that Cathedral facilities consistently are used by the largest number of people, the on-street parking space occupancy rate in the study area was found to be about 101 percent, with 1,534 parked vehicles and 1,514 legal parking spaces. Although overall the survey showed a shortage of 20 parking spaces, there were actually approximately 73 legal parking spaces unoccupied and available for use in the vicinity of the Cathedral, of which 19 spaces allowed unrestricted parking; 45 spaces allowed two-hour parking until 9:00 p.m. (unlimited thereafter), except for area residents with a residential permit parking sticker; eight were white spaces (passenger loading and unloading); and one was a blue space (handicapped parking). This numerical discrepancy occurs because a large number of vehicles were illegally parked in the area; approximately 93 vehicles were observed to be illegally parked. On the same evening, the 65-space Grace Cathedral off-street parking lot was found to be about 109 percent occupied. This survey was conducted on Tuesday, December 17, 1991 between 7:00 p.m. and 9:00 p.m. Off-street parking occupancy during the weekday evening surveyed was about half full, with about 460 available spaces. The off-street parking lot survey was also conducted on Tuesday, December 17, 1991 between 7:00 p.m. and 9:00 p.m./4/

- An inventory of existing on-street parking supply on a Sunday morning within a two-block radius of Grace Cathedral indicates a total of about 1,495 legal parking spaces, or approximately 20 spaces fewer than found during the weekday evening, because of different parking regulations that are in effect on one block on Sunday mornings. This inventory was taken on December 12, 1991./4/ Approximately 95 percent of these spaces are unmetered, and five percent are metered,

although these metered spaces are free after 6:00 p.m. There are about 1,255 unmetered ('grey curb') spaces; 84 unmetered white spaces (passenger loading and unloading); 73 unmetered yellow spaces (loading zones, available for unrestricted use on Sundays); 9 unmetered green spaces (short term parking, ten minutes); 61 unrestricted metered spaces, available for unrestricted use on Sundays; 10 metered yellow spaces (loading zones, available for unrestricted use on Sundays); and 3 unmetered blue spaces (handicapped parking). The 930 public off-street parking spaces, noted above, are also available on Sunday mornings./4/

Currently, on Sunday mornings, there is some surplus supply of on-street legal parking spaces even though the overall on-street parking occupancy for a Sunday morning was found to be about 99 percent, with 1,475 parked vehicles and about 1,495 legal spaces. Overall, the survey results showed a surplus of about 20 on-street parking spaces. However, there were actually 70 legal on-street parking spaces available and unoccupied in the project area, of which about 50 spaces allowed unrestricted parking; about 20 were white spaces (passenger loading and unloading); and one was a blue space (handicapped parking). This numerical discrepancy is caused by a large number of illegally parked vehicles in the area; approximately 55 vehicles were observed to be illegally parked. On the same day, the Cathedral's on-site parking lot was 100 percent occupied. The Sunday morning survey was conducted on December 15, 1991, between 8:00 a.m. and 12:00 noon. Public off-street parking spaces within the study area had an occupancy rate of about 47 percent, leaving about 490 public off-street spaces available for use./4/

A survey of Grace Cathedral meeting participants, which provided mode split information, showed that on a typical Tuesday evening, about 30 percent drove alone to the Cathedral by car or truck; about 21 percent carpooled; about 3 percent arrived by motorcycle; and the remaining 46 percent arrived by a travel mode (public transit, taxi, bicycle or walk) that does not generate a parked vehicle. Of those participants who drove, about half parked in an on-street space and half parked in an off-street space (22 percent in the Cathedral's on-site parking lot, 21 percent in the Masonic Garage (across California Street), and seven percent in another off-street parking lot). Approximately 63 percent of meeting participants who drove to the Cathedral did not pay to park. Of those who paid to park, about 71 percent paid less than \$5.00 and about 29 percent paid more than \$5.00. The survey of Grace Cathedral meeting participants was conducted on Tuesday, January 7, 1992 between 7:00 p.m. and 9:00 p.m./3/

Using existing mode split and parking location information for Tuesday evening meeting attendees and the typical 500-person maximum attendance, it is estimated Cathedral activities on a typical Tuesday evening generate a total parking demand of 243 spaces, with an on-street parking demand of about 122 spaces, with the remaining 121 space demand accommodated in the Cathedral's 65-space off-street parking lot and other nearby off-street parking lots. The Cathedral also generates parking demand from staff associated with daytime uses, as described under Existing Travel Demand, on p. 68.

#### FUTURE PARKING

The project proposes to replace the existing 65-space surface parking lot with a 120-space parking garage, thereby increasing the Cathedral's off-street parking supply by about 55 spaces.



It is anticipated that the courtyard area above the garage would not be used for parking except for an occasional hearse at a funeral or a limousine at a wedding. The courtyard area would not be generally used for loading, except for an unusual circumstance such as a band unloading equipment for a concert./5/

Because the proposed project is not expected to result in a perceivable increase in the number of people who would drive to and park at the facilities (see Future Travel Demand and Traffic on pp. 68-71), there would not be a noticeable increase in demand on the parking supply in the vicinity of the Cathedral. Assuming a conservative scenario that all of the new employees would drive alone to work, the estimated increase in demand for parking would be five parking spaces. Although not needed to accommodate increased parking demand for the proposed project, the project proposes to increase the number of on-site parking spaces as required by the *City Planning Code*, with a net increase of about 55 new off-street parking spaces, to about 120 spaces. These additional spaces could reduce existing on-street parking impacts associated with Cathedral activities by lessening the Cathedral's existing parking demand for on-street parking spaces.

- It is expected that the new parking garage could attract some existing drivers who would shift from parking-on-street or parking in other nearby parking garages because a portion of the drivers might choose the convenience of on-site parking over searching for a free on-street space in an area of essentially fully-occupied on-street parking, or walking some distance to another garage after a nighttime function. Based on the travel demand discussion on p. 68, it is expected that the Tuesday evening parking demand would continue to be about 243 parking spaces. The proposed parking garage would accommodate 120 vehicles with a net addition of 55 parking spaces. Thus the on-street demand attributable to Cathedral activities would be reduced from 122 spaces to 67 on-street parking spaces. This assumes that people who park at other off-street parking lots/garages would continue to do so. It should be noted that about two on-street spaces would be lost because of the construction of the parking garage entrance on Taylor Street. Also, actual on-street parking demand reduction associated with Cathedral activities after the new Cathedral parking garage is completed may not be as great if some parkers who currently use other off-street parking lots were to park in the new garage. Nonetheless, the Cathedral's existing on-street parking demand would be reduced by the proposed project.

On a typical Sunday morning, about 600 persons attend services at the Cathedral during a one-hour period, creating a demand on the on-street parking supply. The proposed project is not expected to substantially increase the number of persons who attend the Cathedral on Sunday mornings, thus the parking demand would not be substantially increased as a result of the project.

The proposed project would provide 55 additional parking spaces; thus, existing Sunday parking demand for on-street parking supply would be likely to be reduced.

The *City Planning Code* would require the proposed project to provide 55 parking spaces, in addition to the existing 65 on-site spaces which would be required to remain (*City Planning Code* Sections 150(d) and 151). The proposed subsurface parking garage would contain about 120 off-street parking spaces and would meet the Code requirement.

#### PASSENGER LOADING ZONES

The proposed project would not change the existing passenger loading zones in the vicinity of Grace Cathedral. The Jones Street passenger loading zone at the School for Boys probably would serve as the dropoff and pickup location for the new additional students. As noted in Chapter III, Environmental Setting, the passenger loading zone is used as a school dropoff and pickup during the morning (7:45 a.m. to 8:15 a.m.) and afternoon (2:15 p.m. to 3:30 p.m.)/2/. On the basis that approximately 50 percent of the school's students are dropped off at this location in the morning, with an average of two students per vehicle, and fewer picked up here in the afternoon, it is estimated that about 18 of the new students (about 50 percent of the 36 new students), generating approximately 18 new vte (9 vte to and 9 vte from the school), would also be dropped off here during the morning period. This is a conservative scenario as it would be expected that the percentage of new students dropped off and picked up would actually be lower, because the new students would be upper-grade level students who generally use public transit more than lower-grade level students as their means of travel to and from school./6/ These estimated additional 18 new students would increase the total number of dropoffs to about 118 students during the morning. This equates to 18 new vte (9 vte to and 9 vte from the school) during the morning peak period. Fewer children are picked up in the afternoon than dropped off in the morning because a number of children remain at the School's child care center to be picked up later in the day. The operation of the passenger loading zone currently does not present substantial conflicts with traffic on Jones Street, as discussed in Chapter III, Environmental Setting, and the fewer than nine additional dropoffs/pickups would not be expected to affect the operation of the existing passenger loading zone or existing traffic conditions.

#### PEDESTRIAN MOVEMENTS/2/

The number of pedestrians traveling to the project site is not expected to change; however, some changes to pedestrian routes accessing Cathedral buildings are expected as a result of the proposed



project. During weekdays, primary pedestrian routes to the Cathedral and Cathedral House are on California Street and Taylor Street. After the Cathedral House is removed, the primary pedestrian access to the Cathedral would continue to be from Taylor and California Streets and the new parking garage. Access from California Street would decrease. The vehicle entrance to the parking garage would be on Taylor Street, adjacent to the main pedestrian entrance to the Cathedral. There could be visibility problems at the new garage entrance which could create potential vehicle-pedestrian conflicts on the westside sidewalk on Taylor Street. As shown in Figure 3, p. 18 and Figure 5, p. 20, the garage entrance would be at the back of the sidewalk, just south of the end of the portion of the Crocker Fence to remain, both of which could affect visibility. Problems would be expected to occur more often for pedestrians walking south toward California Street because their line of sight could be partially obscured by the Crocker Fence. The problem would likely occur less often at night when the headlights of vehicles would help alert pedestrians of approaching vehicles. The installation of devices to warn pedestrians of approaching vehicles would minimize potential pedestrian/vehicle conflicts. The Cathedral would install appropriate pedestrian warning devices at the driveway to the proposed subsurface parking garage (see mitigation on p. 84). Weekday access to the Diocesan House would remain about the same. Pedestrian routes to the School for Boys would essentially remain the same. Pedestrian routes to the new Chapter House would principally be oriented to Sacramento Street and the new parking garage.

Pedestrian routes to the project area on weekday evenings would essentially remain the same for the Cathedral itself. The only potential change would be a greater use of the main Cathedral doors facing Taylor Street at peak times. Pedestrian routes to the Diocesan House would remain the same as before. The School for Boys is closed in the evenings. The new Chapter House access would be primarily from Sacramento Street and from the parking garage.

On Sunday mornings, pedestrian routes to the Cathedral would be primarily from California and Taylor Streets, with an emphasis on entering via the new stairway and doors. Pedestrian routes to the Diocesan House would not be expected to change. The School for Boys is closed on Sundays. Pedestrian routes to the new Chapter House would be primarily from Sacramento Street and from the parking garage. As previously noted in Chapter III, Environmental Setting, observations made at the California/Taylor Street intersection indicate that pedestrians most frequently use the crosswalk on the north side of California Street, crossing Taylor Street, and few conflicts with motorists were observed.<sup>1/</sup> Because the project is not expected to generate substantial new pedestrian trips and the external origin of these trips is not expected to change, pedestrian usage of this intersection is also not expected to substantially change.



DEMOLITION, EXCAVATION AND CONSTRUCTION TRAFFIC/7/

- Prior to beginning construction of the project, the project sponsor and construction contractor would meet with the Traffic Engineering Division of the Department of Parking and Traffic, the Fire Department, MUNI, and the Department of City Planning to determine feasible traffic management and mitigation measures to reduce traffic congestion during construction of this project and other nearby projects. To minimize cumulative traffic impacts due to lane closures during construction, the project sponsor would coordinate with construction contractors for any concurrent nearby projects that are planned for construction or which later become known.

During the projected 20-month construction period, transportation impacts would result from truck movements to and from the site during demolition, excavation and construction activities. Demolition and excavation would require about four months and would generate an average of

about 16 daily truck movements per day in or out of the project site, between 9:00 a.m. and 3:30 p.m. During these first two phases, trucks would be expected to use Taylor Street to Clay Street, to Battery Street, to First Street, to I-80 and the Bay Bridge to haul debris and excavation material to disposal sites in the cities of Fremont and Sacramento. Returning trucks would exit I-80 and the Bay Bridge from the Fremont Street exit, to California Street, to Taylor Street.

Construction activities (substructure, superstructure and finishing) would generate an average of ten truck movements per day during the remaining 16-month period. Deliveries of materials would occur between 9:00 a.m. and 3:30 p.m. During the construction phases, trucks would be expected to use the same routing as described above for the first two phases, and would also probably use Sacramento, Taylor and Jones Streets, to California Street, to Van Ness Street, to U.S. 101 South to access the Peninsula and return from the Peninsula via U.S. 101 to Van Ness Street, to California Street, to Taylor Street. Construction trucks would be expected to also use Taylor and Jones Streets, to California Street, to Van Ness Street, to Lombard Street, to U.S. 101 to access the Golden Gate Bridge and the North Bay, and return from the North Bay via the Golden Gate Bridge and Doyle Drive, Richardson/Lombard, to California Street, to Taylor Street. Because the estimated number of truck trips through the California/Taylor Street intersection, most of which would occur outside of the a.m. and p.m. peak periods, would represent a relatively low percentage of intersection trips, it is not anticipated that the operation of this intersection would be substantially affected.

During the one-month demolition phase, the first phase, sidewalks would remain open if safety considerations permit, with overhead protection provided over the west side of the Taylor Street sidewalk. After the demolition phase is complete, all sidewalks would be open during the remaining 19 months, with no overhead protection needed. The site boundary would be enclosed by chain link or solid wood fencing. There are no curb lane or other lane closures anticipated, and the existing parking lot could be used for the loading of trucks during this phase. Lane and sidewalk closures are subject to review and approval by the Department of Parking and Traffic.

Some material storage on-site is anticipated, minimizing some of the construction vehicle trips to and from the site. The previously noted estimated construction truck trips reflect the anticipated storage of some materials on-site. Reinforcing steel and light finish materials would sometimes be stored on-site. Generally, materials would be trucked in as needed. While the parking garage is being built, staging is expected to be on-site, using only the Taylor Street driveway entrance, which would later become the new entrance to the parking garage. Thus, during this early stage, no curb lane or other lane closures are anticipated. Once the garage is built, the parking lane on

- Sacramento Street would be used for staging, mainly for the use of the concrete mixer trucks. A total of three concrete mixer trucks would be used at any one time, requiring up to six parking spaces, at two spaces per mixer truck. The curb space between Taylor Street and the existing driveway to the on-site parking lot provides space for seven vehicles; these seven parking spaces would be used for staging of the mixer trucks. The loss of these spaces would reduce parking supply in the project area. The effects would be localized and temporary (limited to a maximum eight-month phase during the overall 20-month construction period). It is expected that the maximum number of workers at any one time at the site would be 60 workers. It is expected that construction workers would park in the Masonic Garage located across California Street from Grace Cathedral. Temporary parking demand from construction worker's vehicles, and impacts on local intersections from construction worker traffic, would occur in proportion to the number of construction workers who would use automobiles.

Temporary lane blockage on Sacramento and Taylor Streets by queued trucks could reduce the capacities of these streets. The 1-California MUNI line on Sacramento Street could be affected. Blockage during times of peak traffic flow would have greater potential to create conflicts than during non-peak hours because of the greater numbers of vehicles on the streets during the peak hour that would have to maneuver around queued trucks. However, as it is anticipated that no travel lanes would be closed during construction, street capacities would not be affected. Movements of construction trucks in the vicinity of the Cathedral between 7:00 a.m. and 9:00 a.m. or from 4:00 p.m. to 6:00 p.m. would coincide with peak-hour traffic, and would serve to worsen existing service levels. Therefore, truck traffic would be restricted to between the hours of 9:00 a.m. and 3:30 p.m., to avoid peak-period effects (see mitigation measure on p. 83).

#### NOTES - Transportation

- /1/ One-hour traffic observations were made by Environmental Science Associates on Sunday morning, April 5, 1992 between 9:00 a.m. and 11 a.m.; Tuesday afternoon, April 7, 1992 between 4:30 p.m. and 5:30 p.m.; and Tuesday evening, April 7, 1992 between 7:00 p.m. and 9:00 p.m. at California/Taylor, California/Jones, Sacramento/Taylor, and Sacramento/Jones Street intersections.
- /2/ Information provided by Grace Cathedral in a letter dated April 9, 1992 from Sarah Rockwell, attorney for Grace Cathedral, to Environmental Science Associates, Inc. No actual pedestrian counts or passenger loading zone counts were taken.
- /3/ The survey of Grace Cathedral evening meeting participants was conducted by Environmental Science Associates, Inc. on Tuesday, January 7, 1992 between 7:00 p.m. and 9:00 p.m. A total of 141 survey forms were completed and returned.



- /4/ Inventories of public on-street and off-street parking spaces were conducted by Environmental Science Associates, Inc. on December 12, 13 and 15, 1991. Surveys of on-street and off-street parking occupancy were conducted on Sunday morning, December 15, 1991 between 8:00 a.m. and 12:00 noon and Tuesday evening, December 17, 1991 between 7:00 and 9:00 p.m. Results are summarized and tabulated and are available for public review in the project case file at the Department of City Planning, 450 McAllister Street, San Francisco.
- /5/ Paul Lobush, William Turnbull Associates, telephone conversation, April 20, 1992.

- /6/ Rev. Malcolm H. Manson, Canon Headmaster of the Cathedral School for Boys, telephone conversation, June 5, 1992, and June 29, 1992.
- /7/ This section was prepared on the basis of estimates of construction periods, truck movements, construction workers, access routes, truck staging area identification, and location where construction workers would park provided by Chuck Kaplan, Swinerton & Walberg Builders, letter, January 23, 1992 and phone conversation, April 16, 1992.

#### **E. GROWTH INDUCEMENT**

The proposed expansion of the school would add seven new classrooms and some additional library space, as well as additional office and storage space. The new classrooms would accommodate existing activities which are currently held in the basement of the Cathedral and could allow enrollment at the Cathedral School for Boys to increase by a maximum of about 36 students (from approximately 210 students to 240 students). The existing school staff of approximately 30 could increase by a maximum of two staff members./1/

The project could result in the addition of one to three persons to supervise the operations of the proposed parking garage. There would be no further increase in employment on the site beyond the maximum of two staff members associated with the Cathedral School for Boys and the one to three persons that would supervise the operations of the proposed parking garage.

The project would result in the addition of one net new dwelling unit to the site (two dwelling units in the existing Cathedral House would be replaced by three dwelling units in the proposed Chapter House). Dwelling units would be occupied by guests of the Cathedral and Cathedral employees; they would not be rented.

Three net new meeting spaces would be created by the project (one in the Cathedral House and two in the under-stair area), resulting in an increase in meeting capacity of about 500 persons. Since concurrent use of all meeting spaces at their maximum capacity would be unlikely based on current use patterns, it is expected that no intensification of use would occur simply because of the increased capacity.

The project would be built in a developed urban area, and no expansion to the municipal infrastructure not already under consideration would be required to accommodate new development due to, or induced by, the project.

NOTE - Growth Inducement

/1/ Rev. Malcolm H. Manson, Canon Headmaster of the Cathedral School for Boys, letter, September 26, 1991.



## V. MITIGATION MEASURES PROPOSED TO MINIMIZE POTENTIAL ADVERSE IMPACTS OF THE PROJECT

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In the course of project planning and design, measures have been identified that would reduce or eliminate potential environmental impacts of the proposed project. Some of these measures have been, or would be, adopted by the project sponsor or project architects and contractors and thus are proposed; some are under consideration. Implementation of some may be the responsibility of public agencies. Measures under consideration may be required by the City Planning Commission as conditions of project approval, if the project were to be approved. Each mitigation measure and its status is discussed below.

In addition to the mitigation measures below, there are several items required by law which would also serve to mitigate impacts. These measures include: no use of mirrored glass on the building to reduce glare, as per City Planning Commission Resolution 9212; provision of off-street bicycle storage pursuant to Section 155 of the *City Planning Code*; limitation of construction-related noise levels, pursuant to the San Francisco Noise Ordinance (Article 29 of the *San Francisco Police Code*, 1972); and observance of state and federal OSHA safety requirements related to handling and disposal of hazardous materials such as friable asbestos.

Measures which are not required by legislation but which would also serve to mitigate environmental impacts appear below. Mitigation measures preceded by an asterisk (\*) are from the Initial Study (see Appendix A, pp. A.1-27).

### ● ARCHITECTURAL AND HISTORIC RESOURCES

#### MEASURES UNDER CONSIDERATION BY THE PROJECT SPONSOR

- The project sponsor could prepare historic documentation, to Historic American Buildings Survey (HABS) recordation standards, of the Cathedral House and portion of the Crocker Fence to be removed. HABS, which is administered by the National Park Service, is a process involving preparation of written historic and photographic records of a structure to be altered.

## CULTURAL RESOURCES

### MEASURES PROPOSED AS PART OF THE PROJECT

- Given the possibility of encountering archaeological resources within the project site, the sponsor would retain the services of an archaeologist. The archaeologist would supervise a program of archaeological testing prior to the commencement of excavation/construction of the proposed project. The testing program would use a series of mechanical, exploratory trenches, borings, and/or other similar on-site testing methods to help further define the probability of encountering significant archaeological resources during excavation and construction.

If the archaeologist determined on the basis of this testing program that no additional measures were required to safeguard potentially significant archaeological resources, he/she would submit a written report to the Environmental Review Officer (ERO), with a copy to the project sponsor, describing the testing program and his/her conclusions.

Should the archaeologist determine on the basis of the testing program that additional measures were required, he/she would consult with the ERO to determine further actions appropriate to mitigate potential adverse impacts to significant archaeological resources. These additional actions would be implemented by the project sponsor, and could include, but might not be limited to, monitoring of all site excavation by a qualified historical archaeologist. Mitigation might also require the archaeologist to instruct all excavation and foundation crews on the project site of the potential for discovery of cultural or historic remains, and the procedures to be followed if such remains are uncovered.

Should a monitoring program be required, the project sponsor would designate one individual on site as his/her representative. This representative would have the authority to suspend work at the site to give the archaeologist time to investigate and evaluate archaeological resources should they be encountered. During the monitoring program, the archaeologist would record observations in a permanent log, and the monitoring program, whether or not there are finds of significance, would result in a written report to be submitted to the ERO, with a copy to the project sponsor.

Should evidence of cultural resources be found during testing or following commencement of excavation activities, the project sponsor would suspend all activities at the project site which the archaeologist and the ERO, in consultation with the President of the Landmarks Preservation Advisory Board (LPAB), jointly determined could damage such resources, and would implement an appropriate security program to prevent looting or destruction. Upon receiving the advise of the archaeologist, the ERO would then recommend specific mitigation measures, if necessary. These additional measures might include additional on-site investigations by the archaeologist, and/or documentation, preservation, and recovery of cultural material. Ground disturbing activities which might damage discovered archaeological resources would be suspended for a maximum of four weeks (cumulatively for all instances where the ERO requires a delay) to permit inspection, recommendation, and retrieval, as appropriate.

Finally, the archaeologist would prepare a report documenting the cultural resources that were discovered, an evaluation as to their significance, and a description of how any archaeological testing, exploration, and/or recovery program was conducted.

Copies of all reports prepared according to this mitigation measure would be sent first and directly to the ERO for review. Following approval by the ERO, copies of the final report would be sent to the President of the Landmarks Advisory Board and the California Archaeological Site Survey Northwest Information Center. The Office of Environmental Review shall receive three copies of the final archaeological report.

## AIR QUALITY

### MEASURE PROPOSED AS PART OF THE PROJECT

- \*• The project sponsor would require the contractor(s) to sprinkle the site with water during demolition, excavation, and construction activities; sprinkle unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soils, sand or other such material; and sweep surrounding streets during demolition and excavation, as needed, and during construction at least once per day to reduce particulate emissions. The project sponsor would require that the contractor(s) obtain reclaimed water from the Clean Water Program for this purpose. The project sponsors would require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

## TRANSPORTATION

### MEASURES PROPOSED AS PART OF THE PROJECT

- During the construction period, the project sponsor would cause to limit construction truck movement to the hours between 9:00 a.m. and 3:30 p.m., and to prohibit staging or unloading of equipment and materials during the periods of 7:30 a.m. to 9:00 a.m. and 3:30 p.m. to 6:00 p.m., to minimize peak-period traffic conflicts.
- The placement of paving, landscaping or structures in the sidewalk area (subject to City approval) would be done in such a way as to minimize interference with pedestrian traffic.



MEASURES UNDER CONSIDERATION BY THE PROJECT SPONSOR

- The project would include appropriate warning devices to alert pedestrians to vehicles exiting the proposed parking structure during peak times of use.
- The project sponsor would post a sign at the Sacramento Street driveway prohibiting unauthorized vehicular access to the new courtyard.

## **VI. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED**

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In accordance with Section 21067 of the California Environmental Quality Act (CEQA), and with Section 15040, 15081 and 15082 of the State CEQA Guidelines, the purpose of this chapter is to identify impacts that could not be eliminated or reduced to an insignificant level by mitigation measures included as part of the proposed project, or by other mitigation measures that could be implemented, as described in Chapter V. Mitigation Measures, pp. 81-84.

- The proposed project would require demolition of the Cathedral House and removal of about 130 linear feet of the Crocker Fence which is located at the site boundary along Taylor Street. About 90 linear feet of the removed fence would be relocated to the interior of the site, at the north side of the Cathedral; almost all of the remaining 40 linear feet would be relocated to currently unidentified areas of the project site. The Cathedral Close, including the Crocker Fence and certain specific other structures, is designated City Landmark No. 170. (As stated in Chapter III, Environmental Setting, pp. 33-43, the Cathedral House and the surface parking lot are not included in the Landmark.) The State Historic Preservation Officer (SHPO) has determined that the Cathedral Close appears to be eligible for listing on the National Register of Historic Places as a historic district. The SHPO has further determined that the Crocker Fence and the Cathedral House are structures which contribute to the district's overall significance. In addition, the SHPO has determined that the Crocker Fence appears to be individually eligible for listing on the National Register as a rare survivor of the 1906 earthquake and fire.
- Removal of 130 feet (about 30 percent) of the remaining 490 feet of the original circa 1877 Crocker Fence would significantly alter a character-defining feature of the landmark. Relocation of almost all of the fence proposed for removal to the interior of the block and to currently unidentified areas of the project site would not fully mitigate this adverse impact, since the significance of the fences relies in part on its location as a boundary or marker of the Crocker Mansion site. Demolition of the Cathedral House could not be fully mitigated and would significantly affect a district which appears eligible for the National Register. Removal of 130 feet of the Crocker Fence and demolition of the Cathedral House, along with other changes to the Close might affect eligibility of the Close for the National Register. For these reasons, the project would have a significant adverse effect on architectural and historic resources.

## VII. ALTERNATIVES TO THE PROPOSED PROJECT

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This chapter identifies alternatives to the proposed project, discusses environmental impacts associated with each alternative, and gives the reasons the alternatives were rejected in favor of the project. Regardless of the sponsor's reasons for rejection, the City Planning Commission could approve an alternative instead of the proposed project if the Commission believed the alternative would be more appropriate for the site.

### A. ALTERNATIVE A: NO PROJECT

#### DESCRIPTION

This alternative would entail no change to the site. The proposed project would not be built. The existing Cathedral House would not be demolished, and the proposed Chapter House would not be constructed. The additions to the Cathedral School for Boys would not be built, and the existing surface parking lot on the site would be retained. The existing stairs to the Cathedral would not be replaced by the proposed new staircase. New meeting rooms, parking, and open space would not be created on the site. The 130-foot portion of the Crocker fence along Taylor Street that would be removed with the project would remain in its present location. The existing Diocesan House and the Cathedral itself would remain unchanged in this alternative.

#### IMPACTS

If this alternative were implemented, impacts associated with the proposed project would not occur. The environmental characteristics of this alternative would be generally as described in the Environmental Setting sections of this report (see Chapter III, Environmental Setting, pp. 29-49, for a discussion of existing conditions). Transportation, noise, and air quality impacts associated with demolition of the Cathedral House and subsequent construction of the project would not occur (construction noise effects are discussed in the Initial Study which is included as Appendix A, pp. A.1-27). Transportation conditions described in Chapter III, Environmental Setting, pp. 45-49, would continue to exist around the site. Vehicle access to the site would remain from Sacramento Street. There would be no change in energy demand on the site. Land uses and shadows would not change. City Landmark No. 170 would not be altered and the



Cathedral House would be retained on the site in this alternative. This alternative would preserve the option to develop a similar or different type of project on the site in the future.

If this alternative were implemented, and if the Cathedral House was not rehabilitated and maintained, the limestone on the exterior of the building would continue to deteriorate. In addition, some seismic strengthening and renovation of the Cathedral House would most likely be required. Rehabilitation and maintenance of the Crocker Fence might also be required.

## REASONS FOR REJECTION

This alternative has been rejected by the project sponsor because it would not meet the project objectives. This alternative would not provide improved office and meeting space for the Cathedral staff, Cathedral congregation and community groups on the project site; it would not provide additional space for the staff and students of the Cathedral School for Boys; it would not provide additional parking for the Cathedral; and it would not complete Hobart's 1926 plan for the Cathedral site through the construction of a new stairway leading to the main Cathedral entrance, demolition of the Cathedral House, and removal of a portion of the Crocker Fence.

## **B. ALTERNATIVE B: RETENTION OF SITE STRUCTURES**

### **B.1: Crocker Fence Retention In Place**

#### DESCRIPTION

This alternative would have all of the characteristics of the proposed project, except that the 130-foot portion of the Crocker fence along Taylor Street that would be removed with the project would remain in its present location. As with the proposed project, the Cathedral House and the existing surface parking lot would be removed and the proposed Chapter House, subsurface parking garage, and additions to the Cathedral School for Boys would be constructed.

Because the 130-foot portion of the Crocker Fence along Taylor Street would not be removed and relocated, the proposed new staircase leading from Taylor Street to the main entrance of the Cathedral would be redesigned, and the entrance to the proposed subsurface parking garage would be relocated to accommodate the fence in its current location. The proposed new staircase could be built with the fence in front of its northern portion along Taylor Street, or the staircase could be redesigned to be narrower, extending from the corner of Taylor and California Streets to the beginning of the Crocker Fence on Taylor Street. In either case, primary access to the

Cathedral would not be expanded along Taylor Street and would be limited to the vicinity of the Taylor and California Streets corner. Access to the subsurface parking garage, which would be from Taylor Street with the project, would be from Sacramento Street with this alternative, similar to existing access to the surface parking lot on the site.

## IMPACTS

This alternative would be similar to the project, with the exception that a portion of the Crocker Fence would not be removed, and parking access would be on Sacramento Street.. The total land uses on the site with this alternative would be the same as with the proposed project. Traffic impacts on local streets and intersections would be different because the entrance to the new parking garage would be on Sacramento Street instead of on Taylor Street; access to the Cathedral's garage would occur on Sacramento Street, a transit preferential street, instead of on Taylor Street, a local street, and could therefore have a greater impact on MUNI operations. Because new building construction would be similar to that of the project, effects on shadows and subsurface cultural resources would be similar to those of the project.

Structures included in City Landmark No. 170 would not be altered (the 130-foot portion of the Crocker Fence that would be removed with the project would remain in its present location).

Other impacts of this alternative would be similar to those of the proposed project. As with the project, the Cathedral House, which the SHPO has determined is a contributing structure within a district which appears to be eligible for listing on the National Register and is rated "3" in the 1976 Department of City Planning Architectural Inventory and identified in the *Here Today* survey, would be demolished with this alternative. The Cathedral House was also included in the secondary survey area as described in *Splendid Survivors*, p. 227. The Foundation for San Francisco's Architectural Heritage has not surveyed the crest of Nob Hill, or assigned ratings for buildings in that secondary survey area.

## REASONS FOR REJECTION

This alternative has been rejected by the project sponsor because it would not meet the project objectives of completing the Hobart's 1926 plan for the Cathedral Close through the construction of a new stairway leading to the main Cathedral entrance from Taylor Street, demolition of the Cathedral House, and removal of a portion of the Crocker Fence, since either part of the stairs would be inaccessible from Taylor Street, or they would not be as envisioned in the Hobart plan. In addition, the project sponsor has rejected this alternative because access to on-site parking could not be improved by relocating it from Sacramento Street to Taylor Street, and would further impede transit traffic on Sacramento Street.

## B.2: Retention Of Cathedral House And Crocker Fence

### DESCRIPTION

With this alternative, the 130-foot portion of the Crocker Fence along Taylor Street that would be removed with the project would remain in its present location, the Cathedral House that would be removed with the project would be retained on the site, and the proposed Chapter House would not be built. As with the proposed project, the existing surface parking lot would be removed from the site, and the proposed subsurface parking garage and additions to the Cathedral School for Boys would be constructed.

Because the 130-foot portion of the Crocker Fence along Taylor Street would not be removed and relocated, and the Cathedral House would not be removed, the proposed new staircase leading from Taylor Street to the main entrance of the Cathedral would not be constructed, and the entrance to the proposed subsurface parking garage would be relocated to accommodate the fence and Cathedral House in their current locations. Primary access to the Cathedral would not be expanded along Taylor Street and would be limited to the vicinity of the Taylor and California Streets corner. Access to the subsurface parking garage, which would be from Taylor Street with the project, would be from Sacramento Street with this alternative, similar to existing access to the surface parking lot on the site.

### IMPACTS

The total land uses on the site with this alternative would be similar to those of the proposed project. Traffic impacts on local streets and intersections would be different because the entrance to the new parking garage would be on Sacramento Street instead of on Taylor Street; access to the Cathedral's garage would occur on Sacramento Street, a transit preferential street, instead of on Taylor Street, a local street, and could therefore have a greater impact on MUNI operations. Because new building construction would be limited to the subsurface parking garage and the additions to the Cathedral School for Boys, shadow effects would be less than with the project and similar to the effects described for the school additions only. Shadow from the existing Cathedral House would still occur with this alternative.

Structures included in City Landmark No. 170 would not be altered (the 130-foot portion of the Crocker Fence that would be removed with the project would remain in its present location) and



- the Cathedral House, which the SHPO has determined is a contributing structure within a historic district that appears to be eligible for the National Register, would be retained on the site in this alternative. Other impacts of this alternative would be similar to those of the proposed project.

## REASONS FOR REJECTION

This alternative has been rejected by the project sponsor because it would not meet the project objectives. This alternative would not provide improved office and meeting space for the Cathedral staff, Cathedral congregation and community groups on the project site, and it would not complete Hobart's 1926 plan for the Cathedral site through the construction of a new stairway leading to the main Cathedral entrance, demolition of the Cathedral House, and removal of a portion of the Crocker Fence. In addition, the project sponsor has rejected this alternative because circulation and access to on-site parking could not be improved by relocating it from Sacramento Street to Taylor Street.

## C. ALTERNATIVE C: RELOCATION OF REMOVED FENCE TO SITE PERIMETER

### DESCRIPTION

This alternative would have all of the characteristics of the proposed project, except that the 130-foot portion of the Crocker Fence along Taylor Street that would be removed with the project and relocated in part to the proposed courtyard at the interior of the site would be relocated in its entirety to another location along the perimeter of the site. As with the proposed project, the Cathedral House and the existing surface parking lot would be removed from the site and the proposed Chapter House, subsurface parking garage, meeting rooms, open space, and additions to the Cathedral School for Boys would be constructed.

### IMPACTS

Impacts of this alternative would be similar to those of the proposed project, except for removal of the fence. The total land uses on the site with this alternative would be the same as with the proposed project. Traffic effects on local intersections would be the same as with the project. Because new building construction would be the same as with the project, effects on shadow and subsurface cultural resources would be the same as with the project. As with the project, the

- Cathedral House, which the SHPO has determined is a contributing structure within a historic district that appears eligible for the National Register, and which is rated "3" in the 1976 Department of City Planning Architectural Inventory and included in the *Here Today* survey,

would be demolished in this alternative. The Cathedral House was included in the secondary survey area described in *Splendid Survivors*; the Foundation for San Francisco's Architectural Heritage has not completed ratings for buildings in

this survey area. As with the project, City Landmark No. 170 (of which the Crocker Fence is a part) would be altered. This alternative would remove a portion of the Crocker Fence from its location along Taylor Street, as with the project, however, this alternative would relocate the removed fence to another location at the site perimeter rather than to the interior of the block. Some alterations to the fence would be required to accommodate its new location on the site perimeter.

### REASONS FOR REJECTION

This alternative is infeasible because relocating the portion of the Crocker Fence to another location along the perimeter of the site would require extensive modifications to the relocated portions. The only street frontage of the site where the entire length of the removed portion of the Crocker Fence could be relocated would be along California Street. The California Street frontage of the project site slopes downwards from west to east, compared to the nearly level Taylor Street location of the fence. Because the fence would be relocated from a flat site to a sloping site, the rusticated stones at the base of the fence and portions of the remainder of the fence would have to be recut and modified to conform to the slope of California Street. Such modifications to the fence would involve loss of some of the stone at the base of the fence and would otherwise alter the historic character of the fence./1/

### NOTE - Alternatives

/1/ Paul Lobush, William Turnbull Associates, letter to Hillary Gitelman, San Francisco Department of City Planning, Office of Environmental Review, August 14, 1991.



## VIII. DRAFT EIR DISTRIBUTION LIST

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1242 Sacramento Street, No. 6  
San Francisco, CA 94108

0221/125

Thomas Ryan, et. al.  
1298 Sacramento Street, No. 9  
San Francisco, CA 94108

0221/144

Robert Mahony, et. al.  
927 Arguello Avenue  
Redwood City, CA 94063

0222/016

1190 Sacramento  
1190 Sacramento Street, No. 12  
San Francisco, CA 94108

ADJACENT PROPERTY OWNERS

(Continued)

0245/002  
SF Real Estate Department  
25 Van Ness Avenue  
San Francisco, CA 94102

0247/001  
Sunmoor Invest SF Inc  
1155 Jones Street, No. 601  
San Francisco, CA 94109

0247/002  
Sam Lawson, et. al.  
135 Retiro Way  
San Francisco, CA 94123

0247/041  
1200 California Corp  
47 Kearny Street, 3rd Floor  
San Francisco, CA 94108

0252/001  
Hill Inv Co  
1201 California Street  
San Francisco, CA 94109

0253/020  
Masonic Cal  
111 California Street  
San Francisco, CA 94108

0253/020  
Homeowner's Association  
1177 California Street, No. 1821  
San Francisco, CA 94108

0254/024  
Nob Hill Properties, Inc.  
1075 California Street  
San Francisco, CA 94108

PROJECT SPONSOR

Grace Cathedral Corporation  
1051 Taylor Street  
San Francisco, CA 94108  
Attn: Marc DuPlan Lee,  
Canon Chancellor

PROJECT ARCHITECT

William Turnbull Associates  
Pier 1½  
The Embarcadero  
San Francisco, CA 94111  
Attn: Paul Lobush

PROJECT ATTORNEY

Morrison & Foerster  
345 California Street  
San Francisco, CA 94104  
Attn: Zane Gresham, Sarah Rockwell

MEDIA

Associated Press  
1390 Market Street, Suite 318  
San Francisco, CA 94102  
Attn: Bill Shiffman

San Francisco Bay Guardian  
2700 - Nineteenth Street  
San Francisco, CA 94110  
Attn: Patrick Douglas, City Editor

San Francisco Business Times  
325 - 5th Street  
San Francisco, CA 94107  
Attn: Tim Turner



MEDIA (Continued)

San Francisco Chronicle  
925 Mission Street  
San Francisco, CA 94103  
Attn: Ingfei Chen

San Francisco Examiner  
P.O. Box 7260  
San Francisco, CA 94120  
Attn: Gerald Adams

The Sun Reporter  
1366 Turk Street  
San Francisco, CA 94115

Tenderloin Times  
146 Leavenworth Street  
San Francisco, CA 94102  
Attn: Rob Waters

LIBRARIES

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San Francisco, CA 94102  
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Environmental Protection Agency  
Library  
75 Hawthorne Street  
San Francisco, CA 94105  
Attn: Jean Circiello

Stanford University Libraries  
Jonsson Library of Government  
Documents  
State and Local Documents Division  
Stanford, CA 94305

Government Publications Department  
San Francisco State University  
1630 Holloway Avenue  
San Francisco, CA 94132

Hastings College of the Law - Library  
200 McAllister Street  
San Francisco, CA 94102-4978

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109 Moses Hall  
University of California  
Berkeley, CA 94720

## ● IX. SUMMARY OF COMMENTS AND RESPONSES

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## A. INTRODUCTION

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This document contains summaries of the public comments received on the Draft Environmental Impact Report (EIR) prepared for the proposed Grace Cathedral Close Alterations project, and responses to those comments. Also included are staff-initiated text changes.

All substantive comments made at the Draft EIR public hearing before the City Planning Commission on August 6, 1992, and all written comments received during the Draft EIR public review period from July 3 to August 14, 1992, are presented herein by direct quotation, edited to delete repetition and nonsubstantive material only.

Comments and responses are grouped by subject matter and are arranged by topic corresponding to the Table of Contents in the Draft EIR. Each group of comments is followed by its set of responses; the order of the responses under each topic follows the order of the comments. As the subject matter of one topic may overlap that of other topics, the reader must occasionally refer to more than one group of comments and responses to review all information on a given subject. Where this occurs, cross references are provided.

Some comments do not pertain to physical environmental issues, but responses are included to provide additional information for use by decision makers.

These comments and responses will be incorporated into the Final EIR as a new chapter. Text changes resulting from comments and responses will also be incorporated in the Final EIR, as indicated in the responses.

**B. LIST OF PERSONS COMMENTING**

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- Joyce Bickel, Vice President, Nob Hill Association (DEIR public hearing comments, August 6, 1992)
- Anne Bloomfield, Vice President, Landmarks Preservation Advisory Board (DEIR public hearing comments, August 6, 1992)
- Dale A. Carlson (written comments, July 18, 1992)
- Micki Esken-Meland (written comments, August 12, 1992)
- Frank S. Fung, Planning Commissioner (DEIR public hearing comments, August 6, 1992)
- Gary M. Gielow, President, Nob Hill Association (written comments, July 31, 1992)
- Gary Hacker (written comments, August 13, 1992)
- Stanley Herzstein, Executive Director, and Enid Lim, Steering Committee Coordinator, Nob Hill Neighbors (written comments, August 6, 1992)
- Charlie Hurst (DEIR public hearing comments, August 6, 1992; written comments, August 14, 1992)
- Michael Levin (written comments, August 5, 1992)
- M. Toby Levine, Planning Commissioner (DEIR public hearing comments, August 6, 1992)
- Enid Lim (DEIR public hearing comments, August 6, 1992)
- James D. Lowé, Transit Planner, San Francisco Municipal Railway (written comments, July 8, 1992)
- Vincent Marsh, Secretary, Landmarks Preservation Advisory Board (DEIR public hearing comments, August 6, 1992; written comments, August 6, 1992, amended August 7, 1992)
- William McCormick (DEIR public hearing comments, August 6, 1992)
- David Prowler, Planning Commissioner (DEIR public hearing comments, August 6, 1992)
- Marianne Richardson (written comments, August 14, 1992)
- Mark Ryser, Executive Director, Foundation for San Francisco's Architectural Heritage (written comments, August 4, 1992)
- Michael A. Tomlan, Ph.D., Chair, Preservation Committee, Society of Architectural Historians (written comments, August 5, 1992)

## C. COMMENTS AND RESPONSES

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### ENVIRONMENTAL REVIEW AND PROJECT APPROVAL PROCESSES

#### DRAFT EIR COMMENT PERIOD

##### Comment

I remember at a recent hearing on a Draft EIR, there was some concern about the deadline for written comments and questions on the Draft EIR being the same day as the hearing, and in that case, we extended the deadline for written comments. And I think that's a good idea to give people a few more days past the day of the Draft EIR hearing, in case they think of things at the hearing or were not able to attend for some reason. And so, I would just like to ask that, in general, unless there is some good reason, that we allow the public a few days past the Draft EIR hearing in which to get in written comments, rather than the same day. (Commissioner Prowler)

##### Response

The Draft EIR public comment period, which began on July 3, 1992, was originally scheduled to close on August 6, 1992. At the Public Hearing on the Draft EIR on August 6, 1992, the City Planning Commission extended the comment period on the Draft EIR through August 14, 1992.

##### Comment

Now, the matter that I wanted to bring up before was that I do urge you to give people an extension, even further on than Tuesday, because, in my view, the department has inadequately signed the neighborhood. I saw one posting, and that was at the corner of Cathedral School, which is the southeast corner of Sacramento and Jones. There are no postings on Pleasant Street. Those people will all be affected all the way down Sacramento Street. (Charlie Hurst)

##### Response

As stated in the response to the previous comment, the close of the written comment period on the Draft EIR was extended from August 6, 1992 to August 14, 1992. A legal



notice of the availability of the Draft EIR and date of the Draft EIR public hearing was published in the *San Francisco Independent* on July 3, 1992. On July 6, 1992, City staff posted eight notices at and near the project site. The notices describe the project, and state the availability of the Draft EIR and the date of the Draft EIR public hearing. A record of this posting is available in the project case file (Case No. 91.121E), which is available for public review at the Department of City Planning, 450 McAllister Street, San Francisco. Copies of the Draft EIR were mailed to all agencies, groups and individuals listed in the Draft EIR Distribution List on pp. 92-98 of the EIR, including adjacent property owners; notices of availability of the document were mailed to owners of condominiums at 1177 California Street, as listed in the assessor's records. The distribution list included neighborhood organizations. Public notification carried out for the project exceeds the requirements of *CEQA Guidelines* Section 15087(a), which requires a lead agency to use at least one of the three notice procedures described above and complies with Section 31.27(b)3 of Chapter 31 of the *San Francisco Administrative Code*, which requires "posting at or near the site." Chapter 31 includes all three methods of providing the public with notice of availability of the Draft EIR, the length of the review period, and the date of the Draft EIR public hearing.

## PROJECT APPROVAL PROCESS

### Comment

It seems when we went back to the beginning or the end of the EIR, there is a copy of the [Initial Study]. It's in the back of the book . . . when you look at the [Initial Study] . . . , certain problems are identified, including the fence, the historic fence. And then when you read the determination that an Environmental Impact Report is required, which then proceeded to lead us to this large document, which I am sure took a considerable amount of time . . . basically six months, I guess . . .

Now . . . , under the aspect of the items that were mentioned as being significant, it was primarily revolving around the aspect of the fence, as I understand it, that that was the significant impact. And I am wondering, in our own process, are there not certain things that might need to be mitigated, such as the fence? Would we not be able to do that in our conditional use findings? If something can be handled as a condition of use, do we need to go to this long length? . . .

Then my question is -- because I have gone through here quite carefully and looked at the potential effects, some of which have to do with truck traffic during construction and the fence, and there was a small shadow question, but it was determined that that wasn't necessary because it was a less than 40-foot building. So my question is, could the items that are determined to be a problem in the [EIR] be handled in the Conditional Use, rather than going into this process? Now, I realize there are times when there are very lengthy and complex mitigations that are needed. . . . But -- the completion point could have been instead of saying, "yes, there are serious environmental problems related to this project," it could have been negative. Instead of a positive, a negative could have been stated, and then we wouldn't have gone to this next step. (Commissioner Levine)

Response

As noted by the commenter, the Initial Study prepared for the project (included as Appendix A of the EIR on pp. A.1-27) determined that project impacts to cultural resources, including the Crocker Fence could be potentially significant and that an EIR was required to further analyze this and other project effects. If no potentially significant environmental effects had been identified, or if any potentially significant effects could have been eliminated or reduced to a less than significant level through mitigation measures accepted by the project sponsor and included as part of the project, a Negative Declaration would have been prepared stating that no significant effects on the environmental effects would be expected. The project sponsors determined they could not retain the fence and implement the project. Since removal or relocation of a significant architectural and historical resource (such as the fence, which is part of a designated City Landmark) can rarely, if ever, be effectively mitigated, the conclusion of a Negative Declaration was not appropriate.

The EIR appropriately identifies potential environmental effects that could result from project implementation (EIR pp. 50-80), and mitigation measures that would reduce or eliminate potentially significant environmental effects of the project (EIR pp. 81-84). Measures that have been identified, regardless of whether or not they have been accepted by the project sponsor, could be required by the City Planning Commission as conditions of project approval if the project were to be approved. Environmental documents, which must be adopted (in the case of Negative Declarations) or certified (in the case of EIRs) prior to a decision to approve or disapprove a proposed project, cannot assume either subsequent approval or conditions upon which that approval is contingent. Even if

mitigation measures were available to reduce or eliminate the impact of the loss of a portion of the City Landmark, a Negative Declaration would only have been appropriate if all of those measures had been included by the developer. In the case at hand, no measures exist to fully mitigate the impact, so a Negative Declaration was not prepared.

Comment

At section II.D, page 26, please explain why this project requires approval as a planned unit development. What provisions of the Planning Code will be modified to accommodate the project? (Dale A. Carlson)

Response

As noted on p. 26 of the EIR, planned unit developments (PUD's) are intended for projects on sites of greater than one-half acre where the project "may merit a well reasoned modification of certain provisions contained in the *City Planning Code*." As stated on EIR p. 26, the project sponsor would request modification of the standard rear yard requirements (*City Planning Code* Section 134) as part of the PUD, as allowable under Section 304 of the *City Planning Code*. Minor modifications to other Code provisions, such as dwelling unit exposure, may also be requested. An analysis of the project's compliance with the *City Planning Code*, including the specific provisions of the Code which are to be modified through the PUD and/or Conditional Use process, will be included in the Department of City Planning's case report, which will be available to the public one week prior to the hearing on the Conditional Use.

Comment

I would also like to note -- I'm sorry. I don't have the proper technical terminology, but if the Cathedral House is, indeed, eligible, determined, officially determined eligible by the State Office of Historic Preservation, eligible for the National Register, then the usual CEQA procedures that I understand are that demolition of such an eligible building is a significant effect, in terms of CEQA. And, therefore, at the time that you make your decision about this project, which I realize is not today -- and I am not talking about today -- my understanding is that at the time you make your decision, you will have to make findings of some overriding reason to override the significance of this demolition.



If Cathedral House is, indeed, determined by the State Office of Historic Preservation to be eligible for the National Register of Historic Places, that becomes automatically, I believe, under CEQA . . . its demolition automatically becomes a significant effect under CEQA, and the commission would have to find overriding something or other. I can do my homework, but I think that will --. (Anne Bloomfield, Landmarks Preservation Advisory Board)

Response

The National Register of Historic Places is a list of cultural resources, which are significant in architecture, history, and culture to the nation, the states, and individual localities. The list is maintained by the U.S. Department of the Interior, National Park Service. Since publication of the Draft EIR, the State Historic Preservation Officer (SHPO) has determined that the Grace Cathedral Close appears to meet the requirements for listing in the National Register as a historic district (see Appendix C&R-A on pp. C&R.130-131, herein, for a discussion of the National Register criteria, and Appendix C&R-B on pp. C&R.132-133, herein, for the SHPO's determination). The SHPO is the State's expert on National Register eligibility when an official determination has not been made by the Keeper of the Register. According to the SHPO, the Close is significant in the history of religion in California, and as an architecturally distinguished and unified collection of buildings largely designed by Lewis P. Hobart. Because the Cathedral House contributes to the significance of a district which appears eligible for the National Register, demolition of that structure would be considered a significant effect of the proposed project. Please see the discussion of Architectural, Historic and Cultural Resources on pp. C&R. 22-48 for a further discussion of this topic.

*CEQA Guidelines* Section 15043 states that:

"A public agency may approve a project even though the project would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that: (a) there is no feasible way to lessen or avoid the significant effect. . .and (b) specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project."

One of three specific written findings must be made for each significant effect, as identified in *CEQA Guidelines* Section 15091. In addition, as noted in *Guidelines* Section 15093, CEQA requires the decision-makers to balance the benefits of a proposed project against its unavoidable environmental effects in determining whether or not to

approve the project. If the benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." According to *Guidelines* Section 15093(b):

"Where the decision of the public agency allows the occurrence of significant effects which are identified in the Final EIR but are not at least substantially mitigated, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record."

In addition, *Guidelines* Section 15092(b)(2)(B) states that if a project would have a significant effect on the environment that cannot be eliminated or substantially lessened, the lead agency may not approve or carry out the project until it has:

"Determined that any remaining significant effects on the environment found to be unavoidable under Section 15091 are acceptable due to overriding concerns as described in Section 15093."

This is the statement of overriding considerations correctly referred to by the commenter and referred to on p. 25 of the EIR.

Comment

I did want to say that there are many more supporters, other than the residents on the hill, and also a number of them are here today. (Joyce Bickel, Nob Hill Association)

Response

The comment is noted.

Comment

First of all, the Nob Hill Association represents 700 residents and their families within the Nob Hill area. The association takes an active role in reviewing, monitoring, and, in some cases, commenting on activities which will affect our neighborhood. To carry out that role, in this case, the Nob Hill Association has studied the Draft EIR for Grace Cathedral close and has made an on-site visit, as well as examined the project sponsor's presentation with site plans, et cetera. We have reviewed these proposed changes in light of the special considerations of Nob Hill, its history, its views, and vistas from around the hill and Huntington Park, its traffic patterns, public transit use, and parking demands.

In analyzing the DEIR from this perspective, we believe that the DEIR has adequately addressed each of these areas of concern. Furthermore, we believe the program outlined for Grace Cathedral close will allow the cathedral to better serve the diverse needs of our neighborhood and the San Francisco community at large. (Gary M. Gielow, President, and Joyce Bickel, Nob Hill Association)

Response

The comment is noted.

Comment

I think most of the plan is wonderful. I do have strong reservations concerning the parking garage and gift shop for the following reasons: 1) Grace Cathedral and Huntington Park are so intertwined in feeling and environment; 2) I feel a parking lot on Taylor at Sacramento is obtrusive to the neighborhood and enjoyment of the park. Children (and dogs) are so near this parking lot. Sitting in Huntington Park will not be so peaceful gazing on a parking garage. I do not want to see the wild garden between Grace Cathedral's 2 present buildings "go." Perhaps one is not consciously aware of its peace in walking down Taylor or sitting in the park. (Marianne Richardson)

Response

The opinions of the commenter are noted.

**PROJECT DESCRIPTION**

Comment

I personally have a hard time telling from the illustrations what these buildings would look like, and I would like to see something that shows more plainly, other than just their silhouettes, what it is that they would [look] like. (Commissioner Prowler)

In Part II of the Draft EIR, "Project Description", the only illustrations of the proposed project (other than floor plans) are Figures 6 and 7, on pages 21 and 22. These drawings do not show sufficient detail, especially in the case of the proposed new Staircase and Parking Garage Entrance shown in Figure 6. It would be much more helpful to include a photomontage (or, at



least, a more detailed drawing) to show the actual appearance of these new structures and exactly where cars are intended to enter and exit the new garage. The aesthetic impact of the garage entrance, and the necessity for removing all of the Crocker Fence along the 130 foot long section proposed for removal, are not clearly demonstrated in the simplified drawing in Figure 6. (The garage entrance could potentially have a very negative impact on the sidewalk-level view of the Cathedral Complex along Taylor Street.) (Michael Levin)

#### Response

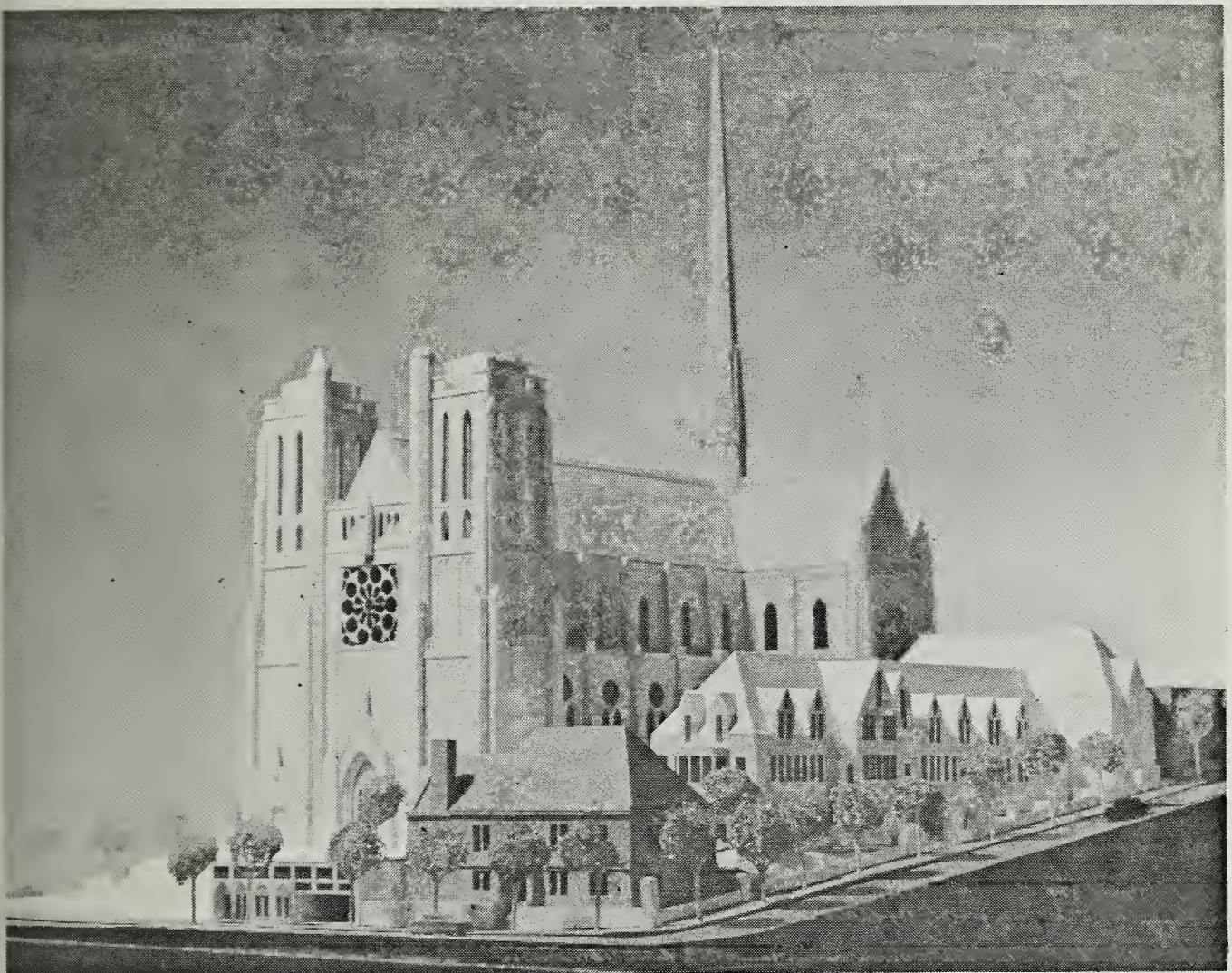
To provide additional information on the proposed new construction in the context of the project site, photographs of a scale model of the project are included in this document as Figures C&R-1 and C&R-2 on pp. C&R.11-12, and an elevation of the proposed gift shop and garage entrance is included as Figure C&R-3, on p. C&R.13. Figure C&R-4, on p. C&R.14, which indicates approximate building envelope of the proposed project in the context of the site, is also included herein. Design details of projects can change between the environmental review and project approval stages; for example, the design treatment of the Taylor Street facade has been modified. Therefore, the illustrations included in the EIR are at a general level of detail and provide the information necessary to complete project environmental review. Detailed drawings and photomontages are most appropriate at the project approval stage, when the specifics of project design are under review by decision-makers.

#### Comment

Please provide a plan for the second basement level (in order to clarify garage circulation, specifically the proposed Taylor Street driveway which is shown nowhere in the EIR). (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

#### Response

Figure 5, on p. 20 of the Draft EIR, is revised as shown below to indicate the location of the driveway to the proposed subsurface parking garage, immediately south of the existing Diocesan House. Inbound traffic would use the lane on the north side of the driveway; outbound traffic would use the lane to the south. The second basement level floor plan was not included in the Draft EIR because of its similarity to the first basement level floor plan, and because parking plans are reviewed by Department of City

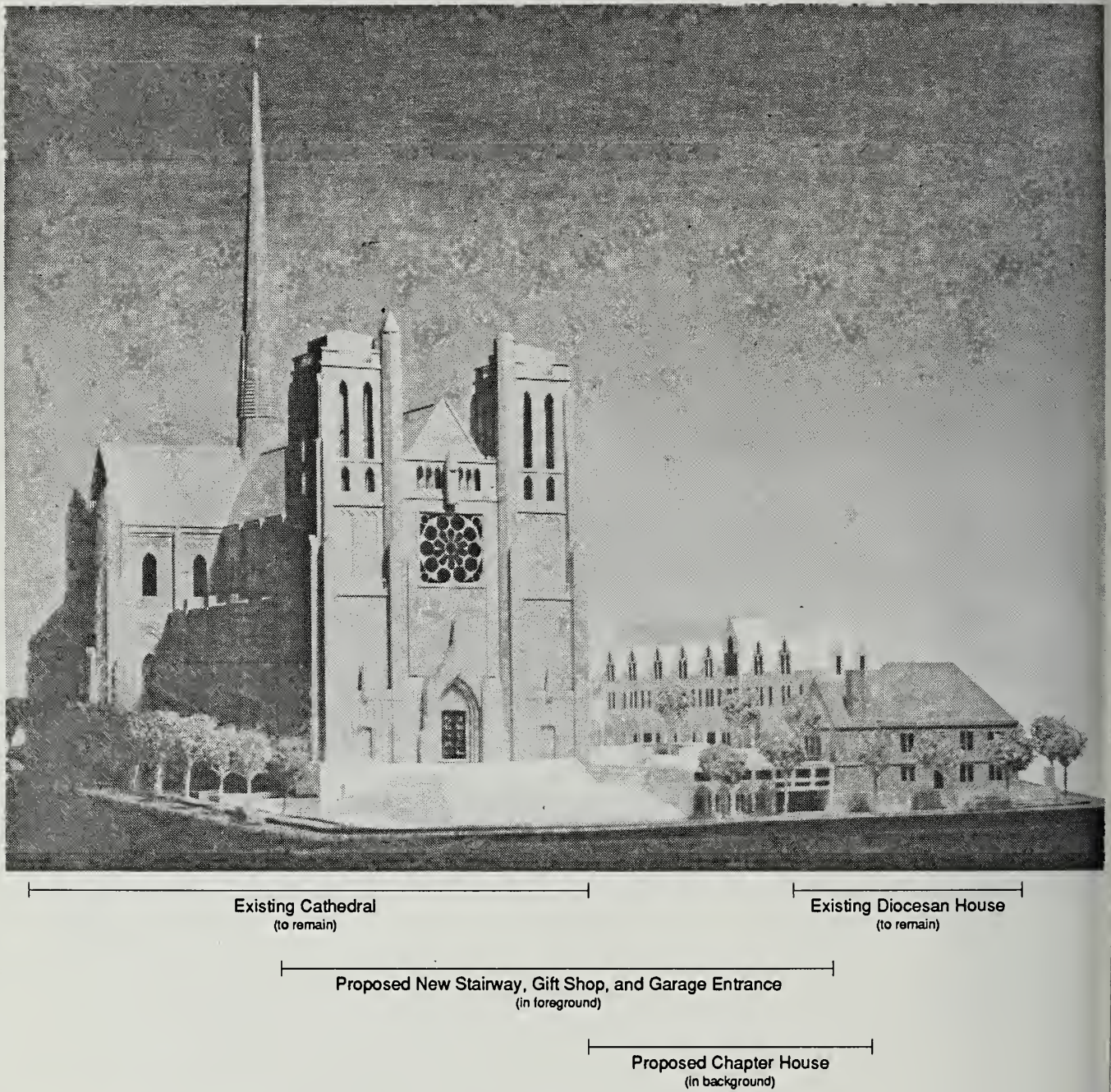


Proposed New Stairway	Proposed New Gift Shop and Garage Entrance	Existing Diocesan House (to remain)	Proposed Chapter House	Proposed School Additions
-----------------------	--	--	------------------------	---------------------------------

SOURCE: William Turnbull Associates *Grace Cathedral* ■

**Figure C&R-1**  
 Photograph of Scale Model of the Site  
 with the Proposed Project Southwest  
 Across Taylor and Sacramento Streets





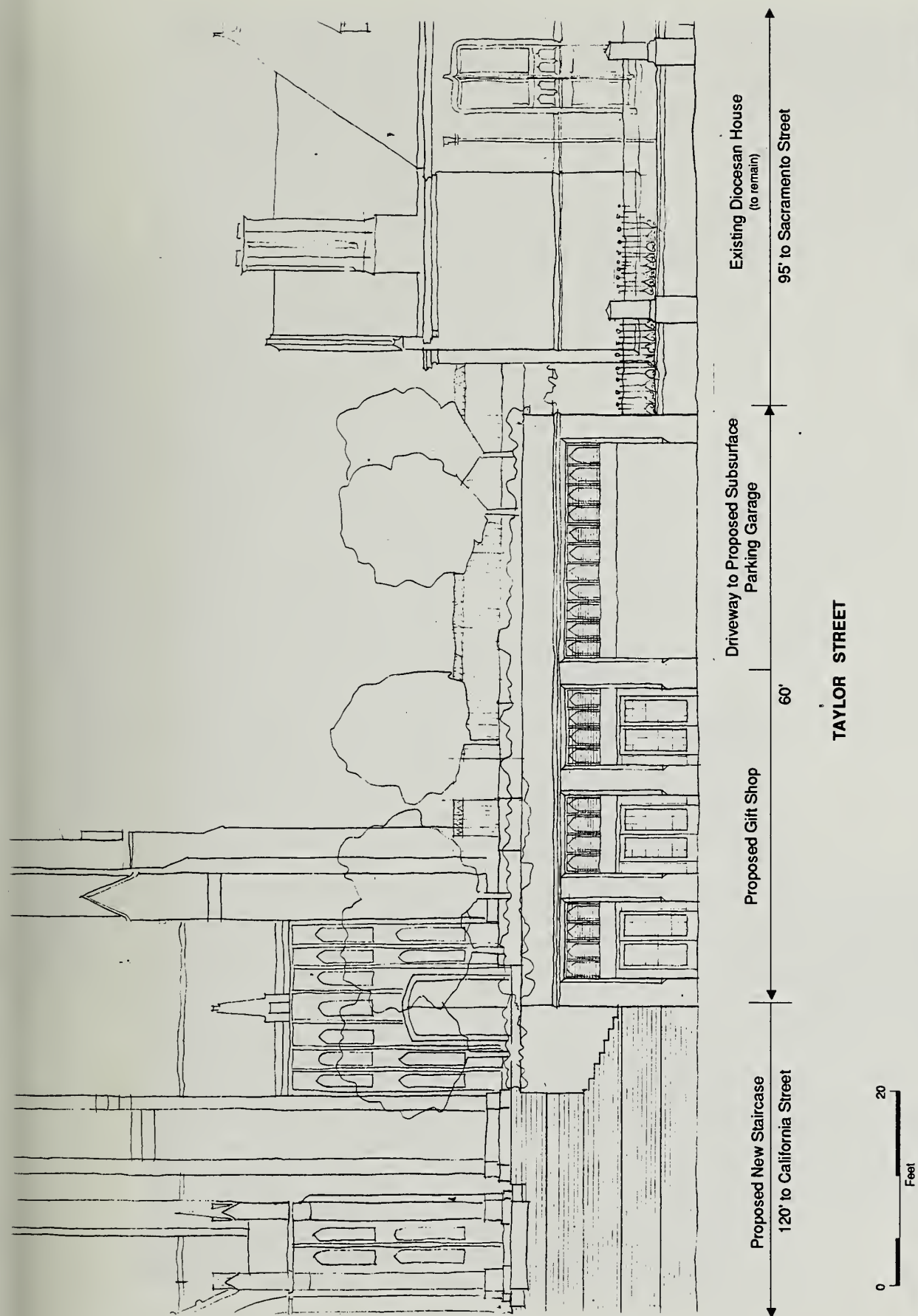
SOURCE: William Turnbull Associates

Grace Cathedral ■

**Figure C&R-2**

Photograph of Scale Model of the Site  
with the Proposed Project Northwest  
Across Taylor and California Streets





SOURCE: William Turnbull Associates

Grace Cathedral ■

**Figure C&R-3**  
Elevation Detail of Taylor Street Showing  
the Proposed Gift Shop and Garage Entrance



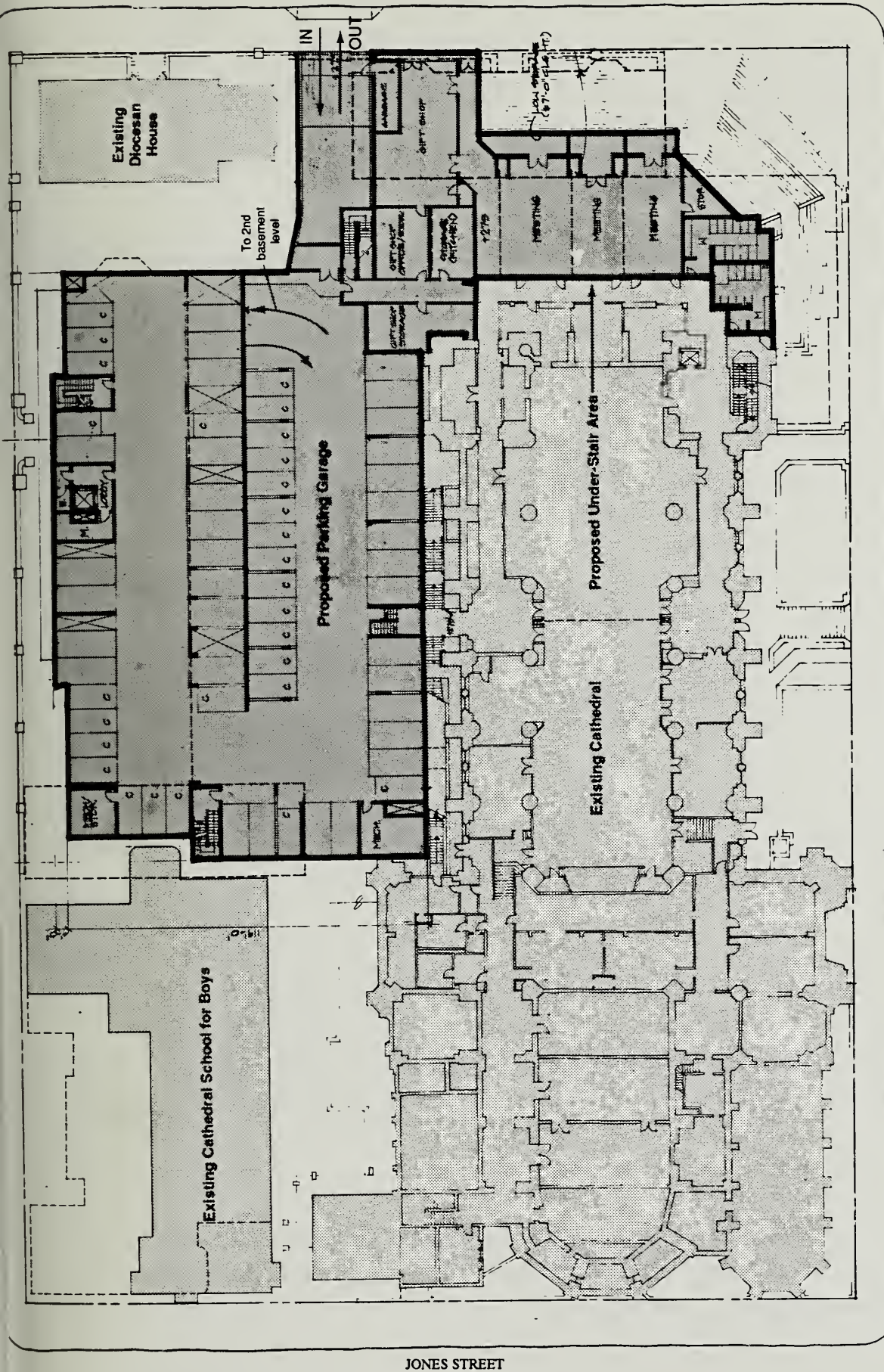


Grace Cathedral ■

SOURCE: Environmental Science Associates, Inc.

**Figure C&R-4**  
View of Sacramento Street Frontage of the Project Site  
Showing Approximate Building Envelope of the  
Proposed Chapter House and School Addition





IN  
OUT

To 2nd basement level

Existing Structures

Proposed New Construction

Grace Cathedral

California Street

Jones Street

0 50 Feet

Existing Cathedral

Proposed Under-Stair Area

Proposed Parking Garage

Existing Diocesan House

Existing Cathedral School for Boys

Classroom

Office

Library

Storage

1279

MEETING

MEETING

MEETING

STAIR

**Figure 5(Revised)**  
First Basement Level  
Floor Plan

SOURCE: William Turnbull Associates



Planning staff but not generally included in the EIR in order to avoid a voluminous document. However, due to the commenter's request, Figure C&R-5, showing the second basement level, is included herein.

Comment

The text, Table 1, and elevations (pages 21-22) state repeatedly that the maximum building heights would not exceed 40 feet and refers to the method defined by the City Planning Code to measure buildings heights. Combined with the floor plans (pages 18-20), there is not enough information to confirm the accuracy of the statements.

This calculation appears to assume that the proposed Chapter House and School Addition (east) would be two separate structures. Is this because one building would house two functions? Is that what the City Planning Code intends? . . .

As we understand the City Planning Code methodology, this calculation accounts for the slope of Sacramento Street in order to determine average building height inclusive of all habitable floors. Does the method of measurement described in City Planning Code Article 2.5, Section 260 (a) apply when a building would be set back from the property line and excavations would result in a level site?

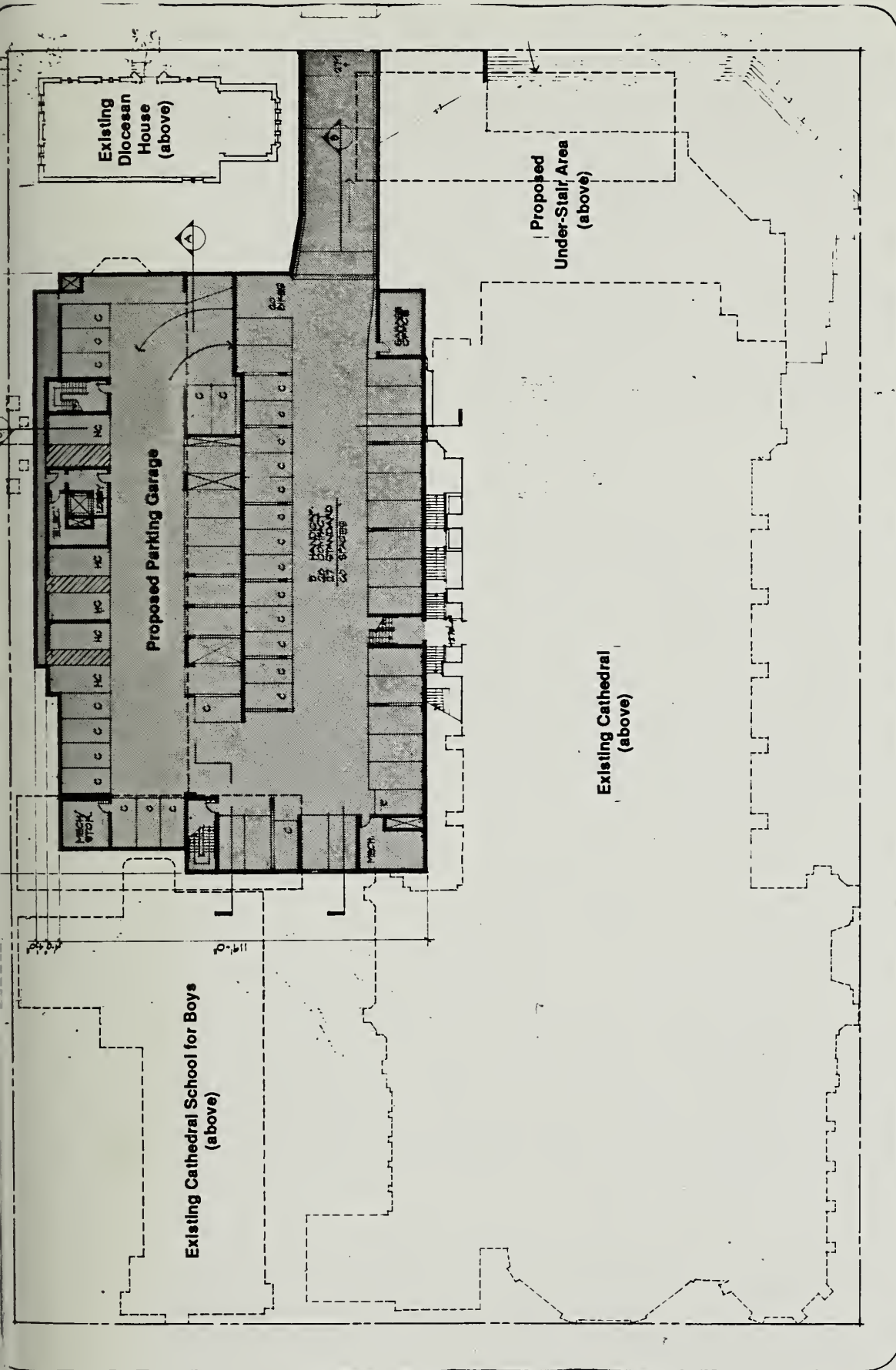
Both the Ground Level Floor Plan and First Basement Level Floor Plan (Figures 3 and 5, pages 18 and 20) show that the Chapter House would be set back approximately 25 feet from the Sacramento Street property line (but that the School additions would abut the northern site boundary).

The EIR must explain the calculation method clearly enough to verify the assertion that the height of the proposed building(s) would not exceed 40 feet. This must be established in the project description since the EIR's shadow analysis uses the project's height to dismiss the applicability of Proposition K. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

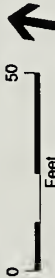
The Chapter House would be set back approximately 11 feet from the Sacramento street property line, not 25 feet as the commenter states. The setback, in this case, does not affect the calculation of height.

TAYLOR STREET



JONES STREET

CALIFORNIA STREET



Proposed New Construction

Grace Cathedral

Figure C&R-5

Second Basement Level Floor Plan

SOURCE: William Turnbull Associates

The height calculations of the proposed buildings are based on *City Planning Code* Section 260, which has been applied by the Zoning Administrator to measure the height of the proposed Chapter House and school addition as follows: from the curb height at the mid-point of each building to the mid-point between the roof peak and the height of the ceiling above the highest usable floor space. The Zoning Administrator has determined that the proposed Chapter House would be a separate building from the proposed school addition. This information may be verified by consulting the Zoning Administrator or the project plans and case report for the Conditional Use application. This case report will be available to the public one week prior to the hearing on the Conditional Use.

#### Comment

The Ground Level Floor Plan (Figure 3, page 18) clearly shows a door connecting the Chapter House and School. Does the San Francisco Fire Department (or Uniform Fire Code) permit such connections between two buildings?

Furthermore, while Figures 4 and 5 imply two separate buildings, project phasing indicates (pages 24-25) that one foundation would be built initially, followed by immediate construction of the Chapter House and implementation of the School Addition when funds are available. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

#### Response

The door referred to by the commenter is an exit stairway door from the proposed school addition. The door would open to the proposed Chapter House exterior arcade; it would not lead to interior portions of that building. As discussed on pp. 15 and 24-25 of the EIR, the buildings would be constructed as two separate structures, with the construction of school addition following when feasible after construction of the Chapter House. Because the proposed parking structure would lie beneath both buildings, the foundations of both buildings would be constructed concurrently with the garage.

#### Comment

According to the EIR (page 13), one of the project sponsor's objectives is "to complete the 1926 Hobart architectural plan for the Cathedral site." Does this mean that, if the project is approved and implemented, the site would be built out completely and that no additional



development would occur there in the future? Besides reorienting the cathedral church and overall site plan, what else did the 1926 Hobart plan include? The site plan should be reproduced in the EIR and the uses and total amount of development envisaged by the plan should be described fully. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

According to the project sponsor, if the project were approved and implemented, there are no plans for additional development on the project site./1/ Should additional development be proposed at some time in the future, it would require additional approval actions including public notification, and would be subject to the requirements of CEQA regarding environmental review.

As noted on p. 13 of the EIR and referenced in the comment, the project sponsor's stated objective is to complete the 1926 Hobart architectural master plan for the Cathedral Close. As discussed on pp. 13-15 of the EIR and in the response to the comment on pp. C&R.24-27, this plan called for the construction of an enlarged Cathedral with a main staircase extending from the Cathedral entrance to Taylor Street, the demolition of the existing Cathedral House to provide an unobstructed view of the Cathedral from Taylor Street, and the construction of other Close buildings along the Sacramento Street frontage with quadrangular landscaped and paved areas between these buildings and the Cathedral. The Cathedral's current proposal, as described throughout the EIR, would consist of the removal of the Cathedral House, the construction of the main staircase to Taylor Street, and the construction of a Chapter House and school addition along the Sacramento Street frontage with a courtyard between these buildings and the Cathedral. No other site plan changes are proposed.

The 1926 Hobart final master plan is reproduced in this document as Figure C&R-6, below. This plan shows the Taylor Street orientation for the Cathedral, the staircase to Taylor Street and to California Street, the absence of the Cathedral House, and secondary Close buildings along Sacramento Street. The Hobart plan differs from the existing Cathedral block site plan; most notably the Cathedral School for Boys is not shown on the 1926 Hobart plan, which also shows more open areas and shows a differently configured Diocesan House. Exact uses and the total amount of development were not included as part of the plan, and are therefore not known.





NOTE - Project Description

/1/ Sarah Rockwell, Morrison & Foerster, memorandum to Kevin Beauchamp, Environmental Science Associates, Inc., December 22, 1992.

LAND USE

Comment

The EIR fails to assess land use impacts of the project. Without an adequate land use analysis, the document does not provide a sufficient basis for completing the required cumulative and growth inducing analyses, all of which must be presented in the EIR before the City can certify it as complete. At the crux of this deficiency is the absence of information about the constituents of the Hobart plan for the site -- what uses are envisaged by the plan, how much development would be accommodated upon buildout, and other features of the plan. Nonetheless, implementation of this plan is repeatedly cited as an underlying objective of the project. The EIR does not verify whether the project would conform with the plan or document inconsistencies with it, if any. Two land use issues directly related to this oversight are intensity of development and definition of the "complete project." Would adherence to the Hobart plan result in more or less building area on the site? (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

Potential land use impacts are discussed on pp. A.9-11, in the Initial Study (Appendix A of the EIR). The project currently under review is described on pp. 13-28 of the EIR. The Initial Study and EIR evaluate potential environmental effects that could result from implementation of the project. The project sponsor proposes to implement relevant features of the Hobart Plan, which the project architect has incorporated into the design proposal. The proposal is not the Hobart Plan itself; that plan is therefore not evaluated.

As discussed on pp. 39-41 of the EIR, the Hobart 1926 architectural plan for the Cathedral site included a reorientation of the Cathedral, the demolition of the Cathedral House and a portion of the Crocker Fence, and the construction of a staircase from Taylor Street to the Cathedral's main entrance. Additional available information concerning this plan is included herein on pp. C&R.19-20 and 24-27. The proposed



project would implement the general site layout of the plan in that it would construct the new staircase leading to the main entrance of the Cathedral after removal of the Cathedral House and a portion of the Crocker Fence. There is currently no indication that the Cathedral would remove or replace other features and buildings on the site to bring it closer to the Hobart site plan./1/ As noted in Table 1 on p. 16 and described on p. 24 of the EIR, the proposed project would result in an increase of about 66,100 sq. ft. of built area on the project site from existing conditions, of which about 49,000 sq. ft. would be new garage space.

As noted on p. 50 of the EIR, the Department of City Planning determined on the basis of the Initial Study prepared for the proposed project (EIR Appendix A, pp. A.1-27; land use is discussed specifically on pp. A.9-11) that the effect of the project on land use would not be significant and required no further environmental analysis. Despite this determination, land use has been discussed in the setting section of the EIR to provide an informational context for understanding project impacts. Figures 8 and 9 on pp. 31-32 of the EIR illustrate existing land uses, zoning districts, and height and bulk districts in the vicinity of the project site. Information on current use patterns at the Close is presented in Appendix C&R-C on pp. C&R.134-139 herein. Comments related to cumulative and growth inducing impacts are responded to on pp. C&R.87-88 and C&R.89-92 of this document.

#### NOTE - Land Use

/1/ Sarah Rockwell, Morrison & Foerster, memorandum to Kevin Beauchamp, Environmental Science Associates, Inc., December 22, 1992.

### ARCHITECTURAL, HISTORIC AND CULTURAL RESOURCES

#### CATHEDRAL CLOSE PLAN BACKGROUND

##### Comment

The major weakness in this EIR is that substance is missing. The close (including the Cathedral House) is not put in the context of its time either historically or architecturally. This was a very important undertaking, the close designed by one of the great church architects, working in

England and retained by the church. The change in orientation is not adequately addressed: what historical or architectural needs dictated this change?

What I would like to point out is there are four things that they [Heritage] say about this structure: First of all, that it is the first permanent component of the earlier design of this site and is the oldest structure on the cathedral complex; secondly, that it's the only structure which dates from the initial period of planning and development of the cathedral site first envisioned by the distinguished church architect, George F. Bodley, and after his death, carried forward by his associate, Cecil Hare; third, that its design, by an important local architect, Louis P. Hobart, is characteristic of the Collegiate Gothic style of the period, and its fine medieval detail and carefully scaled and composed volume impart a sense of historic authenticity to the cathedral complex; and finally, that its placement is consistent with the medieval practice of building in proximity to cathedrals and contributes to the natural effect of the sloping site by scaling down the massive volume of the cathedral to the street and Huntington Park, thereby creating a pleasant pedestrian environment so valued on Nob Hill.

On page 3 and elsewhere: expand greatly the discussion of George F. Bodley, one of the great church architects, including references to influences on him and his work, other of his works, and his original design for the complex. Discuss other church building in the United States at this time. It is very significant that the church went to England to retain the services of this great architect; apparently the church wanted to make a certain statement for its cathedral on this prominent location on the top of the hill. This should be discussed.

An entrance on California was historically significant--California was the street, Taylor only secondarily important. Discuss reasons for change in orientation, including reference to Huntington Park, donated in 1915.

Last paragraph [p. 3]: extended discussion of George F. Bodley (see above), his assistant Cecil Hare, trends in church building in England and U.S., the original role of Hobart, etc. (Greater discussion of Hobart and his work.) Significance of California Street. Next page: greater discussion of change of orientation including contemporary reactions. (Vincent Marsh, Landmarks Preservation Advisory Board)

The structure [the Cathedral House] is important because:

- 1) It is the first permanent component of the earlier design for the site and the oldest structure in the cathedral complex.
- 2) It is the only structure which dates from the initial period of planning and development of the Cathedral site, first envisioned by the distinguished church architect George F. Bodley and (after his death) carried forward by his associate Cecil Hare.
- 3) Its design, by important local architect, Lewis P. Hobart, is characteristic of the "Collegiate Gothic" of this period, and its fine medieval detail and carefully scaled and composed volume impart a sense of historic authenticity to the cathedral complex.
- 4) Its placement is consistent with the medieval practice of building in proximity to cathedrals and contributes to the natural effect of the sloping site by scaling down from the massive volume of the Cathedral to the street and Huntington Park, thereby creating the pleasant pedestrian environment so valued on Nob Hill. (Mark Ryser, The Foundation for San Francisco's Architectural Heritage)

Response

The discussion of architectural, historic and cultural resources on pp. 2-3 of the EIR referred by the commenter is the summary of material in the main EIR text, and therefore describes only key points and does not go into detail. Please refer to Chapter III, Environmental Setting, EIR pp. 33-43, and Chapter IV, Environmental Impacts, EIR pp. 50-53, for a full discussion of architectural, historic and cultural resources.

The discussion of the history and architecture of the structures that comprise the Grace Cathedral Close contained on pp. 39-42 in the EIR sufficiently provides a context for the project, and describes the proposal so as to enable evaluation of the project's effects. Sources consulted included the landmark case report, which is on file and available for review at the Department of City Planning, 450 McAllister Street, San Francisco. Additional historical and architectural information is also available in this landmark case report (City Planning File No. 83.560L). Details about other structures designed by George F. Bodley and Lewis Hobart are not necessary to describe the effects of this project. A further chronological history of the Close (based on information from the Grace Cathedral Archivist and the Foundation for San Francisco's Architectural Heritage/1/) which provides additional historical information follows.

The Grace Cathedral Close site was donated by the Crocker family to Grace Cathedral Corporation in 1907 following the 1906 earthquake and fire. In 1907, the Corporation retained the British architect George F. Bodley to design a Cathedral with an associated



close. Bodley's design called for a north-south orientation of the proposed Cathedral along Jones Street with its main facade and entrance facing California Street. Other close buildings (such as the Cathedral House) were to be generally located along the eastern edge of the block, between the Cathedral and Taylor Street.

After Bodley's death in 1908, his associate Cecil Hare continued to work on the Cathedral Close design. In 1909, Bodley's design for the close was accepted by Grace Cathedral Corporation. In this same year, Hare suggested a reorientation of the Cathedral along California Street, with its main entrance facing east towards Taylor Street; however, it is unclear in the available records whether the acceptance of the close design or the proposal of the Cathedral reorientation came first. The motivation behind this reorientation has not been found in the research conducted for this EIR. In 1910, the cornerstone of the Cathedral in Bodley's design was laid, and the north retaining/foundation walls were constructed.

Architect Lewis Hobart became sole architect for the Cathedral Close in 1910. Hobart, who served as Bodley's supervising architect in 1907-1908, prepared a preliminary master plan for the close in 1910-1911. Hare's suggestion for reorientation of the Cathedral was implemented by Hobart. In addition to the east-west orientation of the proposed Cathedral, Hobart's preliminary plan included the construction of other close buildings along the full frontages of both Taylor Street and Sacramento Street, with courtyard areas between these buildings and the Cathedral. Although Hobart's preliminary plan called for the entrance of the Cathedral to face east, access to the Cathedral would have been from California Street due to the planned location of close buildings along the full frontage of Taylor Street.

Of the close structures that were included in Hobart's preliminary master plan, the Cathedral House (which was known as the Divinity School at the time) was the only one built during this initial period of site planning and development. The Cathedral House was constructed in 1911-1912. Hobart's plan also called for a bishop's house, library, and diocesan house to flank the Cathedral House on the south and north, but these structures were not built during this period. The only other construction that occurred at the close during the 1910s was the development of the Cathedral crypt (the basement unit for the proposed Cathedral), completed in 1914.

Huntington Park was donated in 1915. In 1925, Hobart, in consultation with Boston architect Ralph Adams Cram, began to develop a new concept for the Cathedral Close, and a final master plan was completed in 1926 (see Figure C&R-6 on p. C&R.20). This plan called for the construction of an enlarged Cathedral and the demolition of the existing Cathedral House to provide an unobstructed view of the Cathedral from Taylor Street. A main staircase would extend from the Cathedral entrance to Taylor Street. Other Close buildings would be located along the entire frontage of Sacramento Street with quadrangular landscaped and paved areas between these buildings and the Cathedral.

Construction of Grace Cathedral itself was begun in 1928 on the site of (but not incorporating) the Cathedral crypt, as called for by Hobart's 1926 final master plan. However, demolition of the Cathedral House did not occur, and the main staircase to the Cathedral was not constructed. In 1935, the Diocesan House, which originally served as the Bishop's residence, was constructed at the southwest corner of Taylor and Sacramento Streets. Due to financial conditions, construction of Grace Cathedral was halted several times, and was not completed until 1964. The Cathedral School for Boys, at the southeast corner of Jones and Sacramento Streets, was constructed in 1965-1966.

A discussion of the history and architecture of the Cathedral House is contained on p. 41 of the EIR, and additional information on this structure's historical context is provided above.

The commenter's opinion regarding the Cathedral House is noted. The commenter's points regarding the history of the site plan and the Cathedral House (Heritage's items 1 and 2) are included in the EIR. EIR p. 41 states that the Cathedral House was the first structure to be built on the Cathedral Close site after 1906. Regarding Heritage's item 3, the architectural style of the Cathedral House, referred to as Tudor-Revival in the EIR as described in information provided by the Grace Cathedral archivist cited on EIR p. 43, is included on EIR pp. 41 and 51. The Collegiate Gothic and the Tudor-Revival styles are both examples of the Late Gothic Revival style of early 20th century architecture in the United States, which borrowed elements from earlier periods.

Regarding Heritage's item 4 in the comment, EIR pp. 44-45 describes the urban design and visual quality of the project site and the scale and character of the summit of Nob Hill, and Figures 11-13, EIR pp. 36-38, show the physical character of the site from

several views. EIR p. 54, Urban Design Impacts, describes the effects of the proposed project in the scale and visual character of the site.

Reorientation of the Cathedral was proposed in 1909, as described on pp. C&R.24-27, Cathedral Close Plan Background. The commenter is correct in stating that Huntington Park was donated in 1915. There is no known relationship between the 1909 Cathedral reorientation proposal and development of the park (after 1915).

#### Comment

The EIR states (page 51) the rank of Cathedral House in the 1976 Department of City Planning Inventory ("3") and its exclusion from City Landmark 170 but fails to fully assess the significance of the building. For instance, the Crocker Fence marks the original location of the Crocker Mansion, and [the] Cathedral House:

- Was the first structure built after the Crocker Mansion was destroyed in the 1906 post-earthquake fire.
- Is the last (only) remnant of the Bodley Plan for the site.
- Is a Hobart building "completed in 1912 in accordance with Bodley's 1907 plan for the Cathedral Close . . ." (page 52). (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

#### Response

As noted by the commenter's references, the commenter's points concerning the history of the Cathedral House and its rating in architectural surveys are discussed in the EIR on pp. 41 and 51-52. Additional information on the Cathedral House's National Register status is provided in the response on pp. C&R.31-33. The EIR includes the information in the commenter's first point specifically on p. 41, third paragraph, second sentence (regarding the fact that the Cathedral House was the first structure built after the 1906 earthquake and fire). The commenter's second and third points are addressed in EIR pp. 41 and 51-52, and in the response to the comment on pp. C&R.24-27. As described on pp. C&R.31-33, subsequent to publication of the Draft EIR, the State Historic Preservation Officer (SHPO) has determined that the Cathedral House appears to be eligible for listing on the National Register of Historic Places as part of a Historic District, and the EIR text has been revised to state that removal of the Crocker Fence and demolition of the Cathedral House would significantly impact historic resources.



Revisions to the text of the EIR regarding this issue appear on pp. C&R.42-43 and C&R.121-129 herein. Also refer to the discussion of significance criteria on pp. C&R.40-48.

## HISTORIC SURVEYS

### Comment

The draft report gives the impression that San Francisco Heritage has surveyed the top of Nob Hill (pages 2, 33, 50, 88 and 90). Strictly speaking, the project site is within the secondary survey area as projected in *Splendid Survivors*. The survey, however, has never been extended to the full area proposed. To say, "Ratings have not yet been assigned by Heritage," is to imply that the survey has been done but the ratings have not been made. In fact, Heritage has never surveyed the crest of Nob Hill. (Mark Ryser, The Foundation For San Francisco's Architectural Heritage)

On page 41: Grace Cathedral is listed in Splendid Survivors Secondary Survey Areas (pg. 227) but is not currently rated.

On page 41: The Cathedral House is listed in Splendid Survivors Secondary Survey Areas (pg. 227) but is not currently rated.

On page 42: The Diocesan House is listed in Splendid Survivors, Secondary Survey Areas (pg. 227) but it is not currently rated. (Vincent Marsh, Landmarks Preservation Advisory Board)

### Response

The following revisions regarding Heritage ratings in the secondary survey area are incorporated into the EIR. The second and third sentences of the third paragraph on p. 2 of the EIR are revised as follows (revisions are underlined):

"The Cathedral House was also included in the secondary survey area as described in *Splendid Survivors*, p. 227. The Foundation for San Francisco's Architectural Heritage has not surveyed the crest of Nob Hill, or assigned ratings to buildings in that secondary survey area."

The last sentence of the third full paragraph on p. 33 of the EIR is revised as follows (revisions are underlined and deletions are bracketed):

"Ratings have not [ ] been assigned by Heritage to structures, such as those on the Grace Cathedral property, which are within the secondary survey area, because the Foundation for San Francisco's Architectural Heritage has not surveyed the crest of Nob Hill."

The following text is added at the end of the first full paragraph on p. 41 of the EIR:

"Grace Cathedral was also included in the secondary survey area as described in *Splendid Survivors*, p. 227. The Foundation for San Francisco's Architectural Heritage has not surveyed the crest of Nob Hill, or assigned ratings to buildings in that secondary survey area."

The following text is added at the end of the third full paragraph on p. 41 of the EIR:

"The Cathedral House was also included in the secondary survey area as described in *Splendid Survivors*, p. 227. The Foundation for San Francisco's Architectural Heritage has not surveyed the crest of Nob Hill, or assigned ratings to buildings in that secondary survey area."

The following text is added after the fourth sentence of the first paragraph on p. 42 of the EIR:

"The Diocesan House was also included in the secondary survey area as described in *Splendid Survivors*, p. 227. The Foundation for San Francisco's Architectural Heritage has not surveyed the crest of Nob Hill, or assigned ratings to buildings in that secondary survey area."

The last sentence of the second paragraph on p. 50 of the EIR is revised as follows, and the following sentence is added (revisions are underlined):

"Heritage has not completed ratings for buildings which are within the secondary survey area as described in *Splendid Survivors*, p. 227. The Foundation for San Francisco's Architectural Heritage has not surveyed the crest of Nob Hill, or assigned ratings to buildings in that secondary survey area."

The last sentence of the second full paragraph on EIR p. 88 is revised as follows (revisions are underlined):

"The Cathedral House was also included in the secondary survey area as described in *Splendid Survivors*, p. 227. The Foundation for San Francisco's Architectural Heritage has not surveyed the crest of Nob Hill, or assigned ratings for buildings in that secondary survey area."

Comment

The assessment of architectural and historical resources should cite the Heritage newsletter (March/April 1991, page 3), which, in lieu of a survey rating, evaluates the historic significance of the Cathedral House. (Mark Ryser, The Foundation for San Francisco's Architectural Heritage)

Response

A copy of the Heritage newsletter discussed by the commenter has been added to the project case file and is available for public review at the Department of City Planning, 450 McAllister Street, San Francisco./1/ The response on pp. C&R.24-27 regarding the history of the Cathedral Close includes information found in the cited newsletter article. The EIR does not include opinions or evaluations expressed in periodicals. Such sources are not considered the same as formally adopted architectural surveys which evaluate many resources on the basis of standardized criteria.

## NATIONAL REGISTER ELIGIBILITY

*Cathedral House and Cathedral Close National Register Eligibility*Comment

The EIR states (page 35) that none of the buildings on the site has been "determined eligible" for listing on the National Register of Historic Places. Does this mean that any buildings have been nominated and determined not eligible for listing, or does this statement simply mean that none is listed on the Register?" (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

We believe that Cathedral House is eligible for listing in the National Register of Historic Places as part of what is, in their terminology, a district because there are several different kinds of buildings in it. And we have . . . a letter from the State Office of Historic Preservation that basically says: We need more information. It looks as if maybe it is, but we can't tell for sure. We need more information.

So one of the things we are requesting is that a determination be pursued. It is frequent in CEQA procedures, if there is a building involved that appears to be eligible for the National Register, that a determination is sought from the State Office of Historic Preservation. And we think that



should be done in the case of this building. (Anne Bloomfield, Landmarks Preservation Advisory Board.

The statement "demolition of the Cathedral House . . . would not have a significant environmental impact on Architectural and Historic Resources" is neither accurate nor substantiated. The Cathedral House appears eligible for the National Register of Historic Places. An official determination of its eligibility should be requested from the State Office of Historic Preservation (SHPO). Under CEQA, demolition of a building determined eligible for the Register is a significant environmental impact.

On page 42: The entire Grace Cathedral Close appears eligible for listing in the National Register of Historic Places according to Staff and Members of the Landmarks Board and a determination of eligibility is warranted by the State Historic Preservation Officer. Grace Cathedral Close appears eligible under Criteria A, B, C and D. (Vincent Marsh, Landmarks Preservation Advisory Board)

Let me close by saying that the Society of Architectural Historians does not become involved in the vast majority of local preservation controversies across the country, for there simply isn't the time. The treatment of the Grace Cathedral complex is more than a local concern, however. It has been determined eligible for the National Register of Historic Places, and is a landmark of nation-wide significance. (Michael A. Tomlan, Ph.D., Society of Architectural Historians)

#### Response

EIR p. 33-35 identifies buildings in the project vicinity listed on or determined eligible for the National Register of Historic Places. At the time of publication of the Draft EIR, none of the buildings on the project site were listed on the Register or determined eligible. The State Historic Preservation Officer (SHPO) makes preliminary determinations of eligibility for the National Register based on the criteria and criteria considerations listed in Appendix C&R-A on pp. C&R.130-131, herein. The SHPO is the State's expert on National Register eligibility when no formal determination (by the Keeper of the Register) has been made. The criteria referred to by Vincent Marsh in the comment above are as follows:

The quality of significance in American history, architecture, archeology, culture, and engineering is present in districts, sites, buildings, structures, and

objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. that are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. that are associated with the lives of persons significant in our past; or
- C. that embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. that have yielded, or may be likely to yield, information important in prehistory or history.

At the time of Draft EIR publication, the Cathedral House was the subject of a "request for determination of eligibility" which, as noted in the comment, elicited a response that not enough information has been provided to make a determination. Since it is the standard procedure of the Office of Environmental Review to rely on existing surveys and designations which are based on established criteria and procedures, a request for a determination by the SHPO was not made for this EIR. EIR preparers may not advocate for or against, on a given issue, but rather must provide an objective evaluation. To request that the SHPO find the Cathedral House to be eligible for the National Register would be to take an advocacy position. The Draft EIR contained the relevant information that was available on the Cathedral House's National Register status at the time of publication.

After publication of the Draft EIR, the SHPO determined that the Grace Cathedral Close appears eligible for inclusion in the National Register of Historic Places as a historic district, and the Crocker Fence appears to be individually eligible for listing on the National Register as a rare survivor of the 1906 earthquake and fire. Based on this change in status, the conclusion of the EIR regarding the significance, or lack of significance, of demolition of the Cathedral House has been changed to conclude that demolition of the Cathedral House and the removal and relocation of the Crocker Fence would have a significant impact on architectural and historic resources.

The EIR's description of the project and its physical impacts remains accurate and requires no revision. However, the apparent eligibility of the Cathedral Close for inclusion in the National Register has necessitated certain revisions to the text of the

Draft EIR. The primary revision to Draft EIR Chapter IV, Environmental Impacts, and revisions to Chapter VI, Significant Environmental Effects That Cannot Be Avoided If The Proposed Project Is Implemented, appear in the response on pp. C&R.41-43 herein. Additional revisions to the EIR text that are necessary to include this information throughout the EIR are included under Staff-Initiated Text Changes, on pp. C&R.121-129 herein. The revisions include similar, revised language for relevant chapters of the Draft EIR. (They are not all included here, so as not to interrupt the comments and responses, themselves.)

## CITY LANDMARK DESIGNATION OF CATHEDRAL HOUSE

### Comment

That rethinking resulted in a new site plan during the 1920s does not alter these facts of the significance of Cathedral House. The original landmark nomination, approved by the Landmarks Board and the Planning Commission, included the Cathedral House. The Board of Supervisors excluded it from the ordinance which designated the site. (Mark Ryser, The Foundation For San Francisco's Architectural Heritage)

Basically, the high points, shall we say, of these comments, are principally that Cathedral House was excluded from the landmark nomination by the Board of Supervisors when the cathedral close was made a landmark. However, both this commission, as it was constituted at the time of the landmarks designation, and the Landmarks Board had recommended that Cathedral House be included. So, in terms of the determination of the Planning Commission at that time, and also the Landmarks Board, Cathedral House is significant. (Anne Bloomfield, Landmarks Preservation Advisory Board)

On page 50: While it is true that the Cathedral House is not part of Landmark No. 170, the DEIR fails to mention that the Cathedral House (Gibbs Hall) (as well as the parking lot) was initially part of the Landmark site nominated by the Landmarks Board and the City Planning Commission and was excluded from the designation at the Board of Supervisors under Ordinance Number 323-84 effective August 5, 1984. The Cathedral House is the oldest building extant on the site, dating from 1911-12, designed by Lewis P. Hobart, architect of many prominent public buildings and private houses in the Bay Area.



Heritage also addresses the point that the Cathedral House was part of the landmark nomination and, in 1985, it was excluded from the nomination when it was passed forward through the Landmarks Board to the City Planning Commission to the Board of Supervisors. (Vincent Marsh, Landmarks Preservation Advisory Board)

We specifically asked on page 5 of our response to the Initial Study/[EIR Requirement] . . . that the EIR "explain the process used when the 'cathedral close' was designated City Landmark 170 and the basis upon which Cathedral House was excluded.

This EIR should state when the site was designated a City Landmark and explain why Cathedral House was excluded. If Cathedral House was excluded specifically to permit future demolition, the EIR, as a full and fair public disclosure document, should state this. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

#### Response

As stated on p. 35 of the EIR, "the Cathedral House was recommended for inclusion in City Landmark No. 170 by the City Planning Commission and the Landmarks Preservation Advisory Board; it was excluded from the final designation by the Board of Supervisors." The Board of Supervisors is the only decision-making body with the authority to officially designate a Historic Landmark or District under the authority of *City Planning Code* Section 1004. While the EIR presents information about the Landmarks Preservation Advisory Board and City Planning Commission actions to decision makers and the public, it would be conjecture to speculate about the motivation of the Board of Supervisors in excluding the Cathedral House. There are no minutes or transcripts from the Board of Supervisors meetings that state the Board's reason for excluding the Cathedral House from the City Landmark designation.

In response to comments received on the Draft EIR, the EIR preparers reviewed the Board of Supervisors File No. 90-86-6 regarding Ordinance No. 323-84 (Designation of Grace Cathedral as a Landmark). The case file was found to contain the following information:

1. Copies of the ordinance;
2. Transmittals to the Board from the Department of City Planning;

## IX. Summary of Comments and Responses

3. Letter from Peter G. Platt, Esq. of Brobeck, Phleger & Harrison, "submitted on behalf of the Bishops and Trustees of Grace Cathedral," to Supervisor Kopp, Chair of the Planning, Housing, and Development Committee, requesting a continuance, dated May 10, 1984;
4. Letter from John Taylor, Clerk of the Board, to Mr. Platt, regarding continuance of the matter;
5. Letter from Mr. Platt to Supervisor Kopp, dated June 7, 1984; and
6. A record of Board and Committee Actions on the ordinance as follows:

May 15, 1984 continued to June 1984

June 19, 1984 amended -- recommended as amended

June 25, 1984 passed for second reading

July 2, 1984 finally passed

July 6, 1984 passed [signed by the mayor]

The June 7, 1984 letter from Mr. Platt indicated that the Cathedral's concerns were communicated to Supervisor Kopp, Chairman of the Planning, Housing and Development Committee of the Board of Supervisors. Cathedral concerns included the following:

1. That each of the properties on the Cathedral block should have been evaluated separately, rather than as a single unit. Designation of the entire block would include not only the five properties on the site, but also the parking lot.
2. That the architect of the cathedral in its final form, Lewis P. Hobart, specified in his plans that the Cathedral House building should be demolished, and that the Cathedral House substantially blocks views of the front of the Cathedral.

Materials contained in the Board of Supervisors File No. 90-86-6 may be requested and reviewed by any member of the public. The ultimate decision of the Board, as described in the EIR, was to designate the Cathedral Property exclusive of the Chapter House and parking lot. The Board's action represents the official designation made by the City's elected representatives in conformance with law. For further discussion of significance criteria see the responses to comments on pp. C&R.40-48.

### Comment

On page 2: should say why and by which governmental body the Cathedral House was not included in the landmark designation (even though this is said later). (Vincent Marsh, Landmarks Preservation Advisory Board)

Response

The commenter is referring to the Summary chapter of the EIR, which does not include all of the information which is included elsewhere in the document. Chapter III, Environmental Impacts, Section B, Architectural, Cultural and Historic Resources, EIR p. 35, notes that the Cathedral House was recommended for inclusion in City Landmark No. 170 by both the City Planning Commission and the Landmarks Preservation Advisory Board, and was subsequently excluded from that final designation by the Board of Supervisors.

Comment

You also know that I am a member of the Landmarks Board, and it has been spoken to, but one of the things that has not been said was that they have landmarked the school, which is not even 50 years old, but they haven't landmarked the Cathedral House, which was built right after the earthquake. (Enid Lim)

Bless the cathedral. It is, as Enid says, such a jewel. I get terribly emotional talking about this. I am so pleased that Mr. Marsh made clear what the situation is with Cathedral House. It is patently absurd for it not to be considered a landmark, if the cathedral, for pity's sake, which wasn't built until 1964, completed, is to be considered a landmark. (Charlie Hurst)

The EIR states (page 35) that Cathedral House was recommended for inclusion in City Landmark 170 but ultimately was excluded. Elsewhere the EIR states (page 42) that the Cathedral School for Boys was included in City Landmark 170. While the designers of the 1966 building are well-known local architects, Cathedral House was the first building constructed on the site after the 1906 earthquake and fire and appears to be the only extant remnant of the original Bodley Plan for the site. The school building is not 50 years old, nor has it achieved significance in the past 26 years, as defined by the National Register of Historic Places' evaluation criteria, whereas Cathedral House can be interpreted as an integral part of a district which meets National Register criteria. Furthermore, Cathedral House meets the exception to the National Register's normal exclusion of religious buildings because it "deriv[es] primary significance from architectural or artistic distinction or historical importance." (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)



Response

The comments are noted. Please see the response to the comments on pp. C&R.34-35 for a discussion of the determination of City Landmark No. 170.

Since publication of the Draft EIR, the State Historic Preservation Officer (SHPO) has determined that the Grace Cathedral Close appears to be eligible for listing in the National Register of Historic Places as a historic district. According to the SHPO, the Cathedral School for Boys does not contribute to the significance of that district, and the Cathedral House is a contributing building. The SHPO's preliminary determination of apparent eligibility is included herein as Appendix C&R-B on pp. C&R.132-133.

CROCKER FENCE

Comment

Also, we feel that the fence is a very important issue, and perhaps it should be moved to California Street, even though that base of it would have to be reconfigured because there was -- according to a historic picture in the DEIR, there was a fence, more of a fence. It does not exist now. It did exist at one time on California Street. So that would be an appropriate place to put it. (Anne Bloomfield, Landmarks Preservation Advisory Board)

Response

The project would relocate approximately 90 linear feet of the removed 130-foot Crocker Fence to the north wall of the Cathedral, at the site of the proposed landscaped courtyard. At the time the Draft EIR was published, there was no proposal to reuse the remaining 40 linear feet. The project sponsor now proposes to reuse almost all of the remaining 40 linear feet of the removed fence./2/ The specific locations on site remains undetermined.

EIR Alternative C discusses relocation of the part of the fence to be removed, to the site perimeter. Relocation of the fence to several potential sites was considered by the project architect. Relocation of the fence to another part of the boundary of the Grace Cathedral block would have been the most desirable option for its relocation, because this would keep the fence in its historic context as a boundary marker separating the block from the street. The only section of the site perimeter that could accommodate the

entire length of the fence is along California Street. Because the California Street frontage of the block slopes down from west to east, as opposed to the relatively level Taylor Street frontage where the portion of the fence proposed for removal is located, the rusticated stones at the base of the fence and portions of the remainder of the fence would have to be recut and modified to conform to the California Street slope. Such modifications to the fence would involve loss of some of the stone at the base of the fence and would change the historic character of the fence./3/ The iron work portion was designed for a level site, and could not be easily reused on a sloping site. For these reasons, the location of the fence to California Street was determined to be infeasible without modifications to its historical character, including configuration and materials.

See response on p. C&R.103, under Mitigation Measures, Architectural, Historic, and Cultural Resources, for a discussion regarding potential relocation of the fence to the school yard of the Cathedral School for Boys.

Comment

On page 2 and also page 85: make it very clear that moving the fence is contraindicated under criteria such as the National Register of Historic Places. (Vincent Marsh, Landmarks Preservation Advisory Board)

Response

As noted in the response to the comment on p. C&R.31-33, the State Historic Preservation Officer (SHPO) has determined that the Crocker Fence appears to be individually eligible for listing on the National Register of Historic Places as a rare survivor of the 1906 earthquake and fire. In response to comments received on the Draft EIR (see pp. C&R.30-31), the National Register criteria and considerations have been included in Appendix C&R-A on pp. C&R.130-131 herein. Criteria considerations state that "ordinarily . . . structures that have been moved from their original locations . . . shall not be considered eligible for the National Register." This may be the "criteria" referenced by the commenter, although the comment is not specific.

Comment

Were the Chinese railroad builders involved in the building of the Crocker fence? What was the source of the granite. Is there a tie in with Central Pacific?

It also should be noted that the Crocker Fence is significant not only as the last remaining relic of the Charles Crocker Mansion, which occupied the Grace Cathedral site before the 1906 Earthquake and Fire but as an outstanding example of Victorian masonry and iron-work construction (1877) probably designed and built by the Central Pacific Railroad engineers. (Vincent Marsh, Landmarks Preservation Advisory Board)

Response

The EIR describes the history of the site and the Crocker Fence, including existing surveys and designations. This information is sufficient to evaluate the impacts of the project and to conclude that removal or relocation of the fence would be a significant, adverse effect. While it may be of interest, the requested additional historic information is not necessary for the environmental analysis.

Comment

The existence of a plaque should be noted near the south portal of the Cathedral. Dated 1983, it memorializes the Crocker family's donation of the land to the Episcopal Diocese. The existence of such a plaque reinforces the importance of preserving the Crocker Fence.

Response

The first sentence of the last paragraph on EIR p. 39 is revised as follows (revisions are underlined):

"The Crocker family donated the site to Grace Cathedral Corporation in 1907, as memorialized by a plaque on the right side of the south portal."

Comment

The EIR states (page 39) that the Crocker Family donated the site. Was the gift unrestricted, or did the donation include any provisions or requirements about site use or development? For



instance, has the Crocker Fence been retained until now in accordance with the gift? We specifically asked on page 5 of our response to the IS/NOP [Initial Study/Notice of Preparation] that the EIR "investigate and disclose any requirements to maintain the fence/wall/gate which may run with the property and/or which may have been imposed as conditions of prior project approvals." The consistency of the project with any relevant restrictions, therefore, must be discussed in the EIR. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

The gift of the Crocker Mansion site restricted use of the property to Grace Cathedral Corporation; otherwise it was unrestricted./4/ Both the commenter's letter of comment on the Initial Study, dated February 2, 1992, and the response of Department staff, dated June 5, 1992, are contained in the project case file, which is available for public review at the Department of City Planning, 450 McAllister Street, San Francisco. The Initial Study referred to by the commenter and contained in the EIR as Appendix A was not a Notice of Preparation.

Comment

On page 39: probably built in 1876; see pg. 43. Kearny demonstrated in front of it in 1877. (Vincent Marsh, Landmarks Preservation Advisory Board)

Response

The first sentence on EIR p. 39 is revised to read as follows (revisions are underlined):

"The Grace Cathedral site was previously occupied by the Charles Crocker mansion, built c. 1876."

CRITERIA FOR DETERMINING SIGNIFICANCE

Comment

The EIR does not define the criteria used in the individual topical analyses to determine the significance of impact. For instance, the EIR implies but does not state that it uses one criterion to determine the significance of architectural and historic resources -- official designation as a City Landmark. Examples of other criteria which the EIR could use (but does not discuss)

include Appendix G of the California Environmental Quality Act (CEQA) or the standards for evaluation of the National Register. (We discuss these criteria further below.) This omission makes it impossible for readers to assess the significance of impacts identified by the EIR and determine whether the EIR fully and fairly reports or downplays the magnitude of project effects. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

For the Draft Environmental Impact [Report] to state that "the combined effects of the components of the project other than the removal of the fence (that is the demolition of the Cathedral House, construction of the new staircase, construction of the Chapter House, additions to the existing school, creation of new open space, and subsurface parking and meeting space) would not have a significant environmental impact on Architectural and Historic Resources" is an obvious attempt to underplay the proposed changes. (Michael A. Tomlan, Ph.D., Society of Architectural Historians)

On page 52: statement "demolition of the Cathedral House . . . would not be considered significant environmental impacts" is neither accurate nor substantiated. (The Cathedral House is rated a '3' in the 1976 Department of City Planning Citywide Architectural Survey, is listed in Here Today, adopted under Board of Supervisors Resolution No. 268-70 and Splendid Survivors Secondary Survey Areas and appears eligible for the National Register. Demolition of said historic structure is an adverse effect which cannot be mitigated. (Vincent Marsh, Landmarks Preservation Advisory Board)

### Response

The CEQA Statutes and Guidelines do not require or provide specific criteria for determining the significance of historic buildings or for determining environmental effects to such buildings, but leaves those determinations to the public agency involved, which must use "careful judgment . . . based to the extent possible on scientific and factual data." (*Guidelines* Section 15064(b)) Items in Appendix G of the *CEQA Guidelines* are provided as examples of significant environmental effects only, and are not binding.

The Department of City Planning looks to existing designations recognized by the preservation community to determine the significance of a historic building, and therefore the significance of the effect that its demolition would have on the environment. Local designations in San Francisco include listing as a City Landmark in

Article 10 of the *City Planning Code* or as a Significant Building in Article 11 of the *City Planning Code*. State designations include listing as a State Historic Landmark or listing on the new California State Register of Historical Resources (the California Register). National designations include listing (or eligibility for listing) on the National Register of Historic Places, designation as a National Historic Landmark, or location of the structure within a National Register Landmark District or a National Register Historic District. In the case of the National Register, the Department of City Planning considers preliminary determinations of eligibility by the State Historic Preservation Officer (SHPO) the equivalent of actual designations until such time that a formal determination is made by the Keeper of the Register. It would be inappropriate for environmental reviewers to set standards for significance related to Architectural and Historic Resources that would supersede local, state and federal standards established by experts in the field and recognized by the preservation community.

The Draft EIR identified the relevant designations for the proposed project. The SHPO's determination that the Cathedral Close appears eligible for the National Register was made after the Draft EIR was published, as noted above. The EIR has been augmented with that information. The following sentence has been added after the second sentence of the second full paragraph on p. 51 of the EIR:

"The State Historic Preservation Officer (SHPO) has determined that the Cathedral House appears to be eligible for listing on the National Register of Historic Places as a contributing structure within a historic district./a/"

In addition, the following text has been added to the beginning of the second paragraph on p. 52 of the EIR:

"Removal of a portion of the Crocker Fence and demolition of the Cathedral House would be considered a significant environmental effect of the proposed project since the fence is part of a designated local landmark and the SHPO has determined that both structures appear eligible for listing on the National Register of Historic Places as part of a historic district. Implementation of these and other components of the proposed project could affect the eligibility of the historic district for listing on the National Register."

Similar changes have been made throughout the Draft EIR, as presented in the Staff-Initiated Text Changes section of this document (pp. C&R.121-129).



## IX. Summary of Comments and Responses

For informational purposes, the EIR identifies whether a building is included in non-governmental surveys in addition to the official determinations described above. No effects of the project on historic resources are concealed or downplayed in the EIR. The Draft EIR found that the project would have a significant effect on architectural and historic resources in that it would alter a City Landmark. Demolition of the Cathedral House, which the SHPO has determined appears to be eligible for inclusion in the National Register as part of a historic district, would further impact architectural and historic resources, which would add to, but not change, the conclusion of the Draft EIR: that the project would have a significant environmental effect.

Because the SHPO has determined since publication of the Draft EIR, that the Cathedral House appears eligible for the National Register as part of a historic district, Chapter VI of the Draft EIR has been revised. The third and fourth paragraphs on p. 85 of the EIR have been revised as follows (insertions are underlined and deletions are bracketed):

"[ ] The proposed project would require demolition of the Cathedral House and removal of about 130 linear feet of the Crocker Fence which is located at the site boundary along Taylor Street. About 90 linear feet of the removed fence would be relocated to the interior of the site, at the north side of the Cathedral; almost all of the remaining 40 linear feet would be relocated to currently unidentified areas of the project site. The Cathedral Close, including the Crocker Fence and certain specific other structures, is designated City Landmark No. 170. (As stated in Chapter III, Environmental Setting, pp. 33-43, the Cathedral House and the surface parking lot are not included in the Landmark.) The State Historic Preservation Officer (SHPO) has determined that the Cathedral Close appears to be eligible for listing on the National Register of Historic Places as a historic district. The SHPO has further determined that the Crocker Fence and the Cathedral House are structures which contribute to the district's overall significance. In addition, the SHPO has determined that the Crocker Fence appears to be individually eligible for listing on the National Register as a rare survivor of the 1906 earthquake and fire.

"Removal of 130 feet (about 30 percent) of the remaining 490 feet of the original circa 1877 Crocker Fence would significantly alter a character-defining feature of [ ] the landmark. Relocation of [ ] almost all of the fence proposed for removal to [ ] the interior of the block and to currently unidentified areas of the project site would not fully mitigate this adverse impact, since the significance of the fences relies in part on its location as a boundary or marker of the Crocker Mansion site. Demolition of the Cathedral House could not be fully mitigated and would significantly affect a district which appears eligible for the National Register. Removal of 130 feet of the Crocker Fence and demolition of the Cathedral House, along with other changes to the Close might affect eligibility of the Close for the National Register. For these reasons, the project would have a significant adverse effect on architectural and historic resources."

Comment

As noted above as an example of the EIR's deficiencies, the criteria used in each topical analysis to assess the significance of impact are not identified. Furthermore, where a criterion is implied, the EIR does not indicate why it was selected -- particularly to the exclusion of other criteria identified by CEQA or commonly used by experts in the respective fields. This selection without explanation suggests that the EIR is incomplete, biased, or both. This is because excluding criteria under which a project would be found to result in a demonstrably significant adverse effect would diminish (or eliminate) the project's impacts and could make it appear more acceptable environmentally -- or politically.

In this instance, according to CEQA, "a project will normally have a significant effect on the environment if it will . . . (j) [d]isrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group . . . (emphasis added). [*CEQA Guidelines*, Appendix G, Item J]

The EIR appears to ignore this criterion of significance while at the same time the EIR presents (page 27) Urban Design Element policies of the San Francisco Master Plan which speak to this topic, as follows (emphases added):

- Objective 2, Policy 4 to "preserve notable landmarks and areas of historic, architectural, or aesthetic value and promote the preservation of other buildings and features that provide continuity with past developments."
- Objective 2, Policy 2 to "recognize and protect outstanding and unique areas that contribute in an extraordinary degree to San Francisco's visual form and character." (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

As noted above, the National Register of Historic Places' Criteria for Evaluation ordinarily exclude from eligibility properties which are owned by religious institutions or are used for religious purposes. The criteria considerations state

"[h]owever, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- a. a religious property deriving primary significance from architectural or artistic distinction or historical importance . . . ."

The EIR must evaluate the significance of the permanent loss of Cathedral House in view of these criteria. Otherwise, the EIR must explain why the criteria are not used to determine the magnitude of impact from this building's demolition and replacement with stairs and a garage. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

For each topic discussed in the EIR, the document reports the magnitude of change anticipated as a result of the project. For some topics where legislated significance thresholds exist (such as shadow), or where quantification is impossible but some clear threshold exists (such as historic resources), these thresholds are used to determine the significance of environmental effects. For other topics where no clear thresholds exist (such as urban design and transportation), the EIR provides information and allows readers and decision-makers to make up their own minds as to what is significant. Since the EIR describes every effect (though it only categorizes the most obvious as significant or not significant), it is not incomplete or biased. As stated in the response to the preceding comment, Appendix G of the *CEQA Guidelines* provides examples only and the section cited by the commenter should not be viewed as a criterion. Likewise, pp. 26-28 of the EIR list relevant objectives and policies of the Master Plan; the EIR does not judge the project's compliance with these policies, because the San Francisco Charter assigns that responsibility to the City Planning Commission. Findings of significant impacts are subject to interpretation and final determination by the City Planning Commission as part of its certification of the EIR, and any revisions by the City Planning Commission will be included in the final document. As part of its consideration of project approval, the City Planning Commission will consider the project's compliance with policies and objectives of the *San Francisco Master Plan*.

As stated in earlier responses, the Department of City Planning uses existing designations, based on established criteria and procedures, as the standard of significance for historic resources. Because the State Historic Preservation Officer (SHPO) has determined that the Cathedral House appears to be eligible for listing on the National Register of Historic Places as part of a historic district, demolition of the Cathedral House would be considered a significant adverse effect (see also response to comment on p. C&R.41-43). National Register criteria and criteria considerations are included in Appendix C&R-A on pp. C&R.130-131.



Comment

In light of the building's importance, recognized in *Here Today* and with a "3" rating in the 1976 survey, Heritage must take issue with the assessment (pages 3 and 52) that demolition of the Cathedral House does not constitute a significant environmental impact. (Mark Ryser, The Foundation for San Francisco's Architectural Heritage)

In addition, this building has ratings in Heritage's Splendid Survivors secondary area survey. It is rated in our 1976 city-wide architectural survey. It is rated in *Here Today*, and now we have a preliminary determination of eligibility for the National Register. So, to say that the building is not significant is incorrect. It's simply because the political process excluded it from landmark designation years ago. (Vincent Marsh, Landmarks Preservation Advisory Board)

Response

As stated in the EIR, the Cathedral House received a "3" rating in the 1976 the Department of City Planning Architectural Inventory, and was listed in the *Here Today* survey. These ratings are included, but are not the basis for a determination of significance. The Department of City Planning relies on existing designations such as local landmark designation or listing on the National Register for the determination of significance (see also the response to the comment on pp. C&R.41-43).

Because the State Historic Preservation Officer (SHPO) has determined that the Cathedral House appears eligible for listing on the National Register of Historic Places as part of a historic district since the Draft EIR was published, the EIR has been revised to reflect that the proposed demolition of the Cathedral House would contribute to a significant impact on historical resources on site, and therefore a significant effect under CEQA (see also the response to the comments on pp. C&R.30-33). While the project site is included in the secondary survey area as described in *Splendid Survivors*, p. 227, the Foundation for San Francisco Architectural Heritage has not surveyed the crest of Nob Hill or assigned ratings to buildings in that secondary survey area.

Comment

At the outset I should note that the Preservation Committee of the Society of Architectural Historians is familiar with the site, and we have reviewed all of the publicly available

information regarding the project. Conceptually, it is apparent that this project is not one that began with any lengthy consideration of the architectural or historical significance of the buildings or structures on the site. The oldest artifact, the Crocker Fence, is cast aside or perhaps relocated, while the oldest building, the Cathedral House (Gibbs Hall), is slated for demolition. All this and the proposed alteration of the front steps of the Cathedral is presented under a rubric of completing "the 1926 Hobart architectural plan for the site." On the contrary, the proposed alteration of the steps, designed to cascade down the site diagonally to the corner and to spill over to the California Street sidewalk is completely indefensible in light of the historical evidence. Such enormous steps were never intended. Unfortunately, the proposal seems to be an attempt to tart-up the entrance in a fashion more akin to a civic center constructed during the 1960s urban renewal era. The folly of demolishing 130 feet of the Crocker Fence and the Cathedral House for the proposed staircase is even more obvious when examining what will be gained below: three meeting rooms with "low storage" space, two dog-legged restrooms, and a triangular storage room! To approach the parking garage from California Street through a long corridor seems exceedingly expensive way to arrange access to the site. (Michael A. Tomlan, Ph.D., Society of Architectural Historians)

I also have a letter from the National Society of Architectural Historians, which I will not read to you, but addressing something some of the issues about this site. They also feel that demolition of Cathedral House is a significant impact and that actually the proposal for the Cathedral steps themselves really are not part of the original plan, in that there is not displayed cascading of the stairs down on to California and Taylor Streets. It would not have been designed in that matter. And so I will pass that letter forward to you as well. . . . I think it would just have been a diagonal staircase, that it would not have wrapped around the corner. (Vincent Marsh, Landmarks Preservation Advisory Board)

### Response

The comments are noted. They represent the opinion of the commenter about the merits of the project and do not directly address the EIR. Thus, no response is required.

The purpose of this EIR is to analyze the proposed project and to determine its effect on the environment. The project proposal was developed by a private sponsor (Grace Cathedral Corporation) and not by the City. Questions and concerns about the project's planning and design should be addressed to the sponsor or to the City's decision-makers

(the City Planning Commission), who will decide whether to approve or disapprove the project.

See the responses to comments beginning on pp. C&R.24-27 under Cathedral Close Plan Background, which discuss the 1926 Hobart Plan and its relation to the project.

#### NOTES - Architectural, Historic and Cultural Resources

- /1/ Heritage Newsletter, "Preservation Notes, Grace Cathedral House," March/April 1991, Vol. XIX, Number 2, p. 3.
- /2/ Although the project sponsor would attempt to relocate all of the remaining 40 linear feet of the Crocker Fence on site, small portions of the fence could chip off or otherwise be damaged during the removal process, or could be of such short lengths that their relocation would be infeasible. Thus, "almost" all 40 linear feet would be relocated.
- /3/ Paul Lobush, William Turnbull Associates, letter to Hillary Gitelman, San Francisco Department of City Planning, Office of Environmental Review, August 14, 1991.
- /4/ Indentures Transferring Ownership of the Crocker Property on Nob Hill to Grace Cathedral Corporation, March 12, 1907. This record is on file and available for review at the Department of City Planning, 450 McAllister Street, San Francisco.

#### URBAN DESIGN AND VISUAL QUALITY

##### SETTING

##### Comment

On page 44: Fairmont Hotel built in 1902, rebuilt after fire of 1906. (Vincent Marsh, Landmarks Preservation Advisory Board)

##### Response

The commenter is correct. The Fairmont Hotel was first built in 1902, and then rebuilt after the 1906 earthquake and fire. The third sentence of the third paragraph on p. 44 of the EIR is revised to read as follows (revisions are underlined):

"The light-toned Renaissance-Revival style Fairmont Hotel, which was built in 1902 and rebuilt in 1906 after the earthquake and fire, lies further to the east across Mason Street."



Comment

It is also important from an urban design context as the Crocker Fence, along with the fences and walls which surround the Flood Mansion (Pacific Union Club) (Landmark No. 64), with its sandstone base and bronze decorative fencing, and the Mark Hopkins Hotel with its original granite retaining wall all predate 1906. These walls, fences and open space areas, such as Huntington Park, create a continuum of time and place and are unique and distinctive features extant on the crest of Nob Hill. (Vincent Marsh, Landmarks Preservation Advisory Board)

Response

The comment is noted. The history of the Crocker Fence is discussed on p. 39 of the EIR, and the vicinity of Grace Cathedral is discussed on pp. 44-45 of the EIR. The removal of about 130 linear feet of the Crocker Fence has been identified as an unavoidable significant effect of the proposed project on p. 85 of the EIR, which also states that the importance of the fence relies in part on its location as a boundary or marker of the former Crocker Mansion site.

SIZE AND MASSING OF THE PROPOSED PROJECT

Comment

Other concerns that we have, of course, are the size of the building that they will be putting up that will take place of the Cathedral House and also be part of the school. That is right up to the property line. (Enid Lim)

Response

The comments are noted. They do not directly address the content of the EIR and no response is needed.

Comment

The EIR states (page 54) that the Cathedral House and school additions would "block some views of the cathedral from the north and change in visual character of Sacramento Street." The EIR skirts the real issue raised by the proposed Chapter House. It would be built adjacent to

Sacramento Street within the existing parking lot which, while paved, provides open space between Sacramento Street and the church building and serves as a setback for the cathedral church building.

The project would move the location and enclose the open space which, therefore, would be "lost" on Sacramento Street; by developing the setback, this breathing room would be "lost." To say that the visual character of Sacramento Street would be changed misses the point and is inadequate.

By omitting a substantive analysis of the project's urban design impacts, the EIR implies (such as on page 3) that the existing parking lot adjacent to Sacramento Street is unsightly and appears to reason that moving parking underground and out of sight would improve the site's visual quality. Applying this logic, the Summary implies that a neo-Gothic building would have no urban design impact, regardless of location on the site, building height, shadows cast, or other factors.

We specifically asked on page 2 of our response to the Initial Study/[EIR Requirement] (IS/NOP) that the "visual impacts of infill development in the existing surface parking lot should be described and thoughtfully assessed. . . ." (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

#### Response

As described in the EIR, the proposed project would construct a new building between Sacramento Street and the existing Cathedral (i.e., in the "setback" referred to by the commenter). The proposed project's effects on urban design and views are described on pp. 53-54 of the EIR. The third sentence of the last paragraph on EIR p. 3 states:

"The Chapter House and Diocesan House along Sacramento Street would form a foreground for the Cathedral in views from the north, and the existing surface parking on the site would be eliminated."

EIR p. 54 indicates that the replacement of the existing surface parking lot with the proposed parking garage and landscaped courtyard would result in an alteration of the close's visual character.

The EIR does not state that existing views of the parking lot are unsightly nor that the Chapter House would have no effect on the urban design of the area. To provide additional information, a view of the Sacramento Street frontage of the project site

indicating the approximate building envelope of the proposed Chapter House is provided in this document as Figure C&R-4, on p. C&R.14.

The Urban Design Element of the *San Francisco Master Plan* contains policies such as maintenance of a consistent street wall and provision of open space as part of new development that may both be applicable, as well as conflicting, on a particular site. The City Planning Commission must review how, on balance, a project responds to the goals and policies of the *Master Plan*. Urban design issues are, to some extent, subjective in nature. The EIR is intended to be descriptive and allow decision-makers and the public to make appropriate judgments based on the information in the EIR.

Both the commenter's letter of comment on the Initial Study, dated February 2, 1992, and the response of Department staff, dated June 5, 1992, are contained in the project case file, which is available for public review at the Department of City Planning, 450 McAllister Street, San Francisco.

#### Comment

This is to reiterate my stated concerns regarding Grace Cathedral's proposal to severely alter the configuration of the existing property, and by so doing to simultaneously effect, albeit with all good intentions, a negative alteration of one of San Francisco's most serene, beautiful and significant urban landscapes. In its historically apt present setting above the two graceful smaller buildings (Cathedral House and Diocesan House), the Grace Cathedral Close constitutes a quietly gracious frame for the elegance but cozy residential and recreational block that crowns Nob Hill. Removal of Cathedral House, its south border row of beautiful poplar trees, its architectural harmony with its surroundings - let alone its replacement by a cold white promenade and a two-way garage entrance/exit! - is, in the view of many, an affront to the civilized ambiance traditional to the neighborhood.

This letter speaks deliberately and only briefly to the aesthetic and historic concerns raised by the proposed project. For a complete understanding of the environmental considerations which a significant number of us feel are inadequately addressed by the Draft EIR on Project 91.121E, I urge you and your fellow commissioners to a careful study of Nob Hill Neighbors' two detailed responses to the EIR document. These were dated February 2, 1992, and August 6, 1992, and addressed to Environmental Review Officer Barbara Sahm of the City Planning Department. We



count on her unbiased assessment of Grace Cathedral's proposal to profoundly and we feel deleteriously change the face and feeling of Nob Hill. (Charlie Hurst)

Response

The comments are noted. The proposed project's urban design and visual quality effects are discussed on pp. 53-54 of the FIR and in the responses to the comments on pp. C&R.48-57. The February 2, 1992 letter from Nob Hill Neighbors that responded to the Initial Study was considered during preparation of the Draft EIR, and was responded to by the Department of City Planning in a letter dated June 5, 1992. The August 6, 1992 letter from Nob Hill Neighbors that commented on the Draft EIR is included and responded to in these Comments and Responses, by topic.

VIEWS

Comment

I urge you to consider the total context, not just the cathedral close, but step back. Go back as far east as the Fairmont Hotel. Look at the entire surround, the stunning buildings from Taylor Street on California to Mason Street, the great hotels, Huntington Park, the Flood Mansion, the Pacific Union Club, the very handsome block of a few too high buildings on Sacramento Street between Mason and Taylor, and then the exquisite frame that the cathedral close, as it stands, represents. (Charlie Hurst)

Response

The comment is noted.

Comment

Another thing that disturbs me aesthetically is the thought -- picture the Masonic Temple, a stunning building, which I understand San Francisco dug in its heels about. By the way, I have lived here. I have lived on Pleasant Street a year longer than Bill McCormick has, and I have been there since 1964, in the city since 1959. And I guess you know how that qualifies me. The Masonic temple was a thorn in a lot of flesh, I guess. . . .

The thought of a sweep -- I mean, I am picturing here Piazza San Marco, cold white marble in the Masonic Temple, then California Street, then more cold white marble stretching forever to Sacramento Street down Taylor Street. It is going to be very cold. And San Francisco gray and white and awfully cold looking in a lot of places because no one here has planted many trees. I just feel that the present close, the structure, and the surround, as it's done, is so forgiving, so inviting, so welcoming, so churchy, if you will. It has a far more quality of spirit feeling to it than what is now being proposed. (Charlie Hurst)

Response

The opinions of the commenter regarding the existing Cathedral Close are noted. The use of white marble for new construction in the Cathedral Close along Taylor Street is not proposed as part of the project.

Comment

I have a couple of personal comments because I have worked very closely with the Nob Hill Association on the board of directors for the last 15 years, and particularly in raising the funds to completely renovate Huntington Park, which is now the jewel of our city. We have raised and spent about \$800,000 on Huntington Park, and we just now have permission from Park and Rec to redo the steps, for which we have donated \$40,000. So we are very concerned naturally with what goes opposite our Huntington Park. We feel that -- we have seen all of the slides and the pictures and the architects drawings of what will happen -- opening up that front area opposite that park would be an added attraction to the hill. (Joyce Bickel, Nob Hill Association)

Response

The comment is noted. Views of the proposed project from Huntington Park are discussed on p. 54 of the EIR.

Comment

On pages 53ff and pages 67ff: The most important views to be considered in this EIR are the views of the Cathedral, not the views of the Bay. As one reaches the crest of Nob Hill, either on foot in a vehicle or by public transportation, one is rewarded with the great open spaces or "urban rooms" created by the setbacks of the Fairmont Hotel, the Mark Hopkins Hotel, the Pacific Union Club, and the designated open space of Huntington Park. The open space created by the

Cathedral steps, which in their current configuration, creates a small "urban room" and which is part of the "tout ensemble" of the open spaces extant on Nob Hill. There are also significant urban design vistas of the Cathedral from the north, northeast, and east. Photos of these existing vistas are needed in the FEIR. Vistas seen by the public from Sacramento and Taylor Streets to the Cathedral, from Huntington Park, and from the MUNI Line No. 1 Westbound would be helpful. The No. 1 California line is very busy line, scheduled for 25 runs between 5:00 and 6:00 p.m. alone, most of them at peak capacity of standees. This line of MUNI must bring over two thousand passengers a day to where they can enjoy the view of the Cathedral. The night lighting and the Christmas lighting are especially appreciated from this line.

The best view of the site of the Cathedral is from the north because one can get far enough away to appreciate the whole site. California Street is not wide enough for such a view. The proposed new Chapter House would block all of this view except perhaps for the roof.

From the northeast and east there is a very pleasing vista of the two Tudor Revival buildings at the sidewalk, enclosed by the Crocker Fence, with the Gothic Revival Cathedral set back behind them. The contrast of styles, and of building masses and voids, gives a European ambiance not equaled elsewhere in the City. If the existing Cathedral House is demolished, this ambiance will be destroyed. (Vincent Marsh, Landmarks Preservation Advisory Board)

It is more than somewhat European in context, and Ms. Levine, you said it would be lovely to have our Ghiberti doors. We have our Ghiberti doors, and we look at them as many Europeans look at the fine doors and towers and stained glass and whatnot of the cathedrals. We get a tantalizing peek at them as we come from California, or if we come from Sacramento, again a tantalizing peek. Why is it that in the United States everything has to blare like a Las Vegas sign? I am sure you will agree. (Charlie Hurst)

#### Response

As noted on p. 54 of the EIR, some views of the Cathedral from the south would be blocked by the proposed Chapter House. The open spaces created by the Fairmont Hotel, Mark Hopkins Hotel, Pacific Union Club, and Huntington Park would not be altered by the project. The area (or "urban room") which currently exists between the Cathedral and Cathedral House would be eliminated.



In response to comments raised on the Draft EIR, Figure C&R-4 on p. C&R.14 has been provided to illustrate the building envelop of the proposed Chapter House and School Addition, as they would be viewed from the northeast corner of Sacramento and Taylor Streets. Figure C&R-4, taken under existing conditions, does not show the elimination of the Cathedral House, which would make a larger portion of the Cathedral's facade visible from the east than under existing conditions.

Urban design impacts are open to subjective evaluation, and while project opponents may favor the urban design of the existing Cathedral Close configuration, project proponents may favor the urban design of the proposed configuration. Because urban design is subjective, the EIR identifies the physical changes proposed as part of the project and allows the readers and decision-makers to determine their significance.

#### Comment

The EIR states (page 54) that the driveway to the new parking garage would be visible but does not assess the impact of the garage entrance either alone or combined with the visibility and unsightliness of several other garage entrances facing this quadrangle. There is no discussion of the visual effect of placing a two-lane wide driveway and entrance adjacent to the Cathedral's proposed grand ceremonial stairway compared with retaining access at a less visible location. Elsewhere in San Francisco, the broad expanses of driveways and garages are referred to as "Richmond Specials", but the EIR does not even evaluate the project's effect, much less the cumulative effect on the top of Nob Hill. However, we specifically asked on page 2 of our response to the Initial Study/Notice of Preparation that the:

- Visual impacts of the proposed two-way garage entrance on Taylor Street should be assessed, primarily from viewpoints in Huntington Park.
- Aesthetic effects of the proposed two-way garage entrance on Taylor Street on the pedestrian environment should be thoroughly described and illustrated. . . . Parking garage entrances detract prominently from pedestrian (or driver) interest. Two examples are located on California Street within steps of the site -- between Mason and Taylor (Crocker Garage) and between Taylor and Jones (Masonic Auditorium Garage). (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

As noted on p. 54 of the EIR, views of the proposed project from Huntington Park would include the Cathedral on the left, the new staircase, the entrance to the gift shop and crypt-level meeting spaces, the driveway to the parking garage, and the existing Diocesan House. Figure 6 on p. 21 of the EIR illustrates an elevation of the proposed Cathedral Close from Huntington Park. The Taylor Street elevation showing the garage entrance in relation to the proposed staircase and gift shop/pedestrian entrance is included as Figure C&R-3 on p. C&R.13. The parking garage entrance would encompass about 25 linear feet of the 275-foot Taylor Street frontage and would therefore be visible to pedestrians from Taylor Street and Huntington Park. According to the project sponsor, the project would include additional landscaping and trees on Taylor Street, which would partially screen views of the entrance to the parking garage. As noted by the commenter, other garages are also visible from these locations. Two-lane driveways and garage entrances are neither unusual nor uncommon features within an urban context such as the summit of Nob Hill. The existing and proposed driveway entrances to the Cathedral Close are described; however, a comparison of their visual characteristics or a discussion of their relative merits would be inappropriate in the EIR. Detailed urban design issues are more appropriately addressed as part of the project approval process. As noted earlier, the urban design information presented in the EIR, including these comments and responses, will be used by the City Planning Commission in its determination of what is appropriate for the site.

Comment

The lines of cars awaiting access and the structure itself are unsightly. The introduction of a garage to our sight line will devalue our property causing great harm to all residents at 1190 Sacramento Street. (Micki Esken-Meland)

Response

The opinion of the commenter regarding the views of the proposed project is noted. Since implementation of the proposed project would not be expected to substantially affect the number of people driving to and parking at the Cathedral's facilities (see pp. 68-71 of the EIR), traffic queues at the proposed parking garage would not be expected to differ substantially from queues for the existing surface parking lot. The

preceding response on p. C&R.56 addresses views of the parking garage. The commenter's concern about property values cannot be documented and does not represent a physical environmental impact of the project requiring analysis under CEQA.

#### Comment

I am also uncomfortable with the gift shop on Taylor - is there a space on California Street (w/ foot traffic) and this street which has a less residential, environmental feel to it? The pillars on Sacramento Street which now access the parking lot are wonderful. Is there a chance of the parking lot entrance still being left there? When I look at the rendering of the proposed grand stairway (wonderful) adjacent to the proposed gift shop and parking lot, the design seems "out of sync" or unbalanced somehow. Is there a way to keep the garden or keep the architecture of the garage more connected to stairs and enter the parking lot on Sacramento? It does occur to me the Hobart Plan was conceived when there wasn't much traffic. Is there a chance of Grace Cathedral parking lot not being on this block - possible use of shuttle busses? (Marianne Richardson)

#### Response

Figure C&R-3 on p. C&R.13 has been added to show the Taylor Street elevation with the gift shop and garage entrance. Access to the Cathedral Gift Shop is currently via Taylor Street.

The EIR has evaluated the environmental effects of the project as proposed, consistent with *CEQA Guidelines* Sections 15126(a) and 15126(d), which calls for "a range of reasonable alternatives . . . which could feasibly attain the basic objectives of the project." As illustrated in Figure 3 in the EIR, the proposed project would retain the portion of the Crocker Fence that is located along Sacramento Street, including the Carriage Gate (i.e., the entrance to the existing surface parking lot). The placement of the gift shop entrance on California Street, the retention of the garden, the placement of an entrance to on-site parking on Sacramento Street, and the construction of off-site parking with shuttle buses have not been proposed as part of the project, and are not under consideration by the project sponsor.



SHADOWComment

The EIR states (page 54) that Proposition K -- Sunlight Ordinance of the City Planning Code (Section 295) -- would not apply to the project because building heights would not exceed 40 feet. There are two problems with this assertion:

- First, this suggests that shadows cast by buildings less than 40 feet high would not constitute significant impacts. The fact is that the presumed inapplicability of Proposition K only means that the remedies contained in that Ordinance would not be available.
- Second, until the City addresses the apparent sleight-of-hand method of measuring the project's proposed building height (as one building), it is not known whether Proposition K does indeed (or does not) apply to the project.

The EIR must establish the relevance of Proposition K as a legal enforcement mechanism written into code. However, a project's effects on loss of sunlight and increased shadowing can have a significant adverse impact other than on formally designated City-owned park and open space areas. Thus, the EIR must also determine the significance of shadows cast (and reduced or eliminated) by the project notwithstanding Proposition K. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

Proposition K, the Sunlight Ordinance (implemented by Section 295 of the *City Planning Code*) prohibits the issuance of building permits for structures that would shade property under the jurisdiction of, or designated to be acquired by, the Recreation and Park Commission unless the City Planning Commission determines that such shade would have an insignificant adverse impact on the use of such property. Section 295(1) specifically exempts structures which do not exceed 40 feet in height from its provisions. Because Proposition K, as implemented, sets clear procedures and thresholds for determining significance of project shadow and was legislated by the voters, it is an appropriate mechanism to use in order to characterize shadow impacts under CEQA. Regardless of the project's exemption from Section 295, the EIR includes a shadow analysis describing project shadow impacts. EIR pp. 54-66 and Figures 15-18 on EIR pp. 56-59 provide this analysis. The EIR authors determined that the shadow impacts of the project described therein would not be significant. Despite the non-applicability of

Proposition K, the City Planning Commission could determine project shadow effects would be significant at the time of EIR certification based on the information provided.

Please refer to the response under Project Description on pp. C&R.16-18 for information concerning determination of the height of the proposed project.

Comment

And I also wonder if there was any thought given to an alternative which would not so significantly shadow Huntington Park. I understand that because the additions are proposed to be under 40 feet, Prop K would not apply, but it seems like a shadow. If there is any way that the building could be shaped or replaced to not impact Huntington Park so much, I would like to see that. Maybe it can't be done, but still I would like to see an alternative which would not so significantly shadow the park. (Commissioner Prowler)

Response

Shadow impacts of the project at 10:00 a.m., noon, and 3:00 p.m. on December 21, March 21, June 21, and September 21 are reported in the EIR (see EIR pp. 55-61). As that analysis shows, the new shadow due to the project would be shadow from the Chapter House and school addition passing over the existing Diocesan House and/or between the Diocesan House and the main Cathedral building. As stated on EIR p. 64:

"Maximum total new project shadow (i.e., combined, overlapping shadow from both the Chapter House and the eastern school addition) would cover approximately 15 percent of the park. At that time, existing buildings (excluding the Cathedral House) would shade an additional 70 percent, thus resulting in a total of approximately 85 percent shading of the park. About the same extent of shading, 85 percent, occurs at that time under existing conditions with the Cathedral House present." (emphasis added)

The approximate maximum new project shadow would approximately equal existing shadow from the Cathedral House, to be removed. (Maximum shadow impact is shown on Figure 20, EIR p. 65.) In summary, there would be little net change in shading of the park due to the project.

The location of the project site to the west and uphill of Huntington Park, and the proximity of the site to the park, means that most buildings on the site would cast

shadow on the park. As proposed, the narrow shape and east-west orientation of the Chapter House would result in less new shadow on the park than a building of similar height oriented with its axis running north to south, as is the proposed orientation of the eastern school addition.

The relation of project shadow impacts on Huntington Park to changes in design can be roughly evaluated by examining Figure 20 on p. 65 of the EIR. At the time shown in this figure, shadow from the proposed Chapter House and the eastern school addition would largely fall within existing shadow cast by the Diocesan House. The pitched roof of the proposed Chapter House would cast a peaked shadow running west to east on Huntington Park, and the Chapter House dormers would add to the north and south sides of this peaked shadow. If the height of the peaked Chapter House roof were reduced by approximately ten feet (to roughly one-half its proposed height), the peak of the roof's shadow would span three-quarters of the width of the park, no longer reaching the eastern side of the park. Therefore, reducing the height of the peak of the Chapter House roof could reduce, but not eliminate, shadow on the park.

#### Comment

And this is another thing. The shadow has to be considered very carefully. That row on Sacramento, between Taylor and Jones, as you know, was considered by the Junior League when it put together Here Today. They didn't include it, for whatever reason, but it is a very important architectural row. Those people are going to be shadowed much of the year, and I want them to be informed. I want the neighborhood to be posted so that everyone knows what is going on. (Charlie Hurst)

#### Response

Figures 15-18 on pp. 56-59 of the EIR show shadow patterns for the project and for existing buildings in the project area (including the Cathedral House, proposed for removal) at 10:00 a.m., noon and 3:00 p.m. on December 21, March 21, June 21 and September 21. These figures show shadows cast on streets, sidewalks, pedestrian areas, and open spaces in the area potentially affected by the project. Buildings on the north side of Sacramento Street between Taylor and Jones Streets shown in these figures would not be affected by project shadow at 10:00 a.m., noon and 3:00 p.m. on March 21,



June 21 and September 21. Generally, project shadow would not affect these houses anytime between 10:00 a.m. and 3:00 p.m. from March 21 through September 21.

The December 21, 10:00 a.m. and noon shadows shown in Figure 15 on p. 56 of the EIR indicate that shadows from both the proposed eastern school addition and the Chapter House would reach the north side of Sacramento Street. On December 21 at 3:00 p.m., project shadow would fall within existing shadow and would not affect the Sacramento Street buildings. The shadows cast by the proposed project would move throughout the day, and the same spot would not be shaded by the same building all day.

## TRANSPORTATION

### REGIONAL ACCESS

#### Comment

The EIR's description of regional access to the site (page 46) omits Taylor Street, thus skewing later analyses of this intersection. The EIR suggests that California Street (westbound) would be used by drivers arriving from the East Bay and that California Street (eastbound) would be selected by people driving from the Peninsula and Marin County. However, people traveling to the site from locations outside the City prefer to remain on the freeway as long as possible in order to avoid difficult city driving:

- Drivers from the East Bay can remain on Highway 101 until the 5th Street exit, jog one block to 6th Street which becomes Taylor Street north of Market. This direct would add vehicle movements to the southern leg of the Taylor-California Street intersection.
- Drivers from the Peninsula can remain on Highway 101 until the 7th Street exit and either continue to the site via 7th and Leavenworth Streets or via 6th and Taylor Streets. This route may be used by drivers confused about how to exit from the Central Freeway but probably would be used less than the route described above.

This omission is significant because the EIR concludes (page 71) that the north leg of Taylor Street would be used and the south leg would not. Thus, the EIR under-estimates both vehicular and pedestrian the impacts on this intersection. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

The regional access routes described on EIR p. 46, for people driving to the project site from the East Bay and Peninsula, are the routes expected to be used by most drivers from these out-of-town areas, based on the assumption that drivers would tend to use larger (i.e., wider, and flatter versus steeper) streets that would provide the most direct path to their destination. In the case of East Bay drivers, the commenters' route via Taylor Street would be longer than the California Street route described in the EIR, and would use Sixth/Taylor Street which is narrower and steeper than California Street. For Peninsula drivers, using Seventh Street to Leavenworth Street, as suggested by the commenters, would be shorter than Van Ness Avenue to California Street, and some people would use this shorter route. The EIR's judgment to designate the latter route was based on an assumption of driver preference for the wider and less steep Van Ness Avenue and California Street.

The project's effects would be spread among the number of alternative routes to and from the project area available to San Francisco and out-of-town drivers and not just those assessed in the EIR or mentioned in the comment. The commenters' suggested routes are among the possible choices. The EIR does not state that the south leg of Taylor Street would not be used. The project's effect on the Taylor Street approaches to the California/Taylor Street intersection, as stated on p. 71 of the EIR, is expected mostly on the north leg of Taylor Street, because of the on-site parking garage. Other project-related vehicles using other parking in the vicinity would not be expected to use Taylor Street. The analysis assumes some project traffic on the south leg, but not enough to noticeably affect this intersection.

## TRAVEL DEMAND

Comment

Throughout the EIR the traffic analysis asserts that project generated traffic would occur during periods lasting several hours at night and on weekends. In demonstrating that project-generated traffic would occur during off-peak times on surrounding streets, the EIR fails to acknowledge, however, that the types of events held at the site generate one inbound surge before the appointed hour(s) and later account for an outbound surge of traffic when attendees leave in unison. In reporting that existing activities at the site generate about 486 VTEs on a Tuesday night between

6:30 and 10:00 P.M., the EIR suggests that about 140 VTEs would be made per hour for the 3.5-hour period. In reality, however, half (243 VTEs) would occur about 6:30 P.M. and the remaining 243 VTEs would be made at 10:00 P.M. This would concentrate the project's traffic and parking impacts rather than diluting them and, therefore, must be taken into account in the EIR analysis. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

The other thing is that most of the things, like at Masonic or at the cathedral, have surges. They come in all at one time, and they leave at one time. So the impacts there are different. And that has not been spoken to in the EIR. (Enid Lim)

Response

The EIR does not assert that project-generated traffic would occur during periods lasting several hours at night and on weekends. As described on pp. 68 and 69 of the EIR, the project would generate new trips from five additional employees and 36 new students (i.e., 20 vte in the morning peak hour and two vte in the afternoon peak hour). Project trips would also be generated during the off-peak hours of the afternoon, chiefly between 2:15 p.m. and 3:30 p.m. when the majority of the students are picked up. Some students remaining after school at the school's childcare center are picked up between 5:00 p.m. and 6:00 p.m.

The existing vehicle trips (vte) discussed in the comment establish the base conditions to which project-generated traffic would be added and therefore are not effects related to the project. Peak-hour vte generated by the project would not noticeably affect existing traffic and parking conditions, as discussed on EIR p. 69. Off-peak vte are not expected to increase substantially because the number of evening function attendees on a typical night is not anticipated to change markedly from the number described for a typical Tuesday (January 7, 1992, when the site was surveyed)./1/ Functions at the Cathedral begin and end at various times throughout the day, as noted in Appendix C&R-C on pp. C&R.134-139, so not all attendees arrive and depart simultaneously.

The third paragraph on p. 68 of the EIR is revised as follows (revisions are underlined and deletions are bracketed) to describe more fully existing arrival and departure patterns for attendees of evening functions at the Cathedral and to account for existing surges in vehicle trips to and from the site:



"Using that mode split information, and attendance estimates, vehicle trip-generation characteristics of the Cathedral on a typical Tuesday evening were estimated to be about 486 vehicle trip ends (vte) [ ]. A vehicle trip end is one vehicle arriving or leaving a destination. This estimate equates to about 243 round trips. Meetings on Tuesday evenings start and end at various times, starting at 6:00 p.m., 7:00 p.m. and 8:00 p.m. and ending as early as 7:00 p.m. and as late as 10:00 p.m. The largest attendance on a typical Tuesday evening is for the Downtown Alcoholics Anonymous which meets between 7:00 p.m. and 10:00 p.m. On the basis that attendees arrive up to 30 minutes before their function's start and depart up to 30 minutes after their function's end, about 200 vte occur inbound to the project vicinity between 6:30 p.m. and 7:00 p.m., and about 190 vte occur outbound from the project vicinity between 10:00 p.m. and 10:30 p.m. The Cathedral also generates travel demand from staff and students associated with daytime uses."

As stated above, the vehicle trips described in the revised paragraph are existing trips and are not new effects from the proposed project.

## TRAFFIC

### Comment

There are just all kinds of traffic, as well as impacts that haven't been addressed in the EIR. As I said, Ms. Sahm will have a chance to read our comments, and I hope that they will be taken into consideration. (Enid Lim)

### Response

The EIR accurately and adequately addresses the project's transportation impacts, considering the absence of substantial capacity increases in the site facilities or projected activities. The commenter does not specify in this comment those impacts not addressed in the EIR. Therefore, no response to this part of the comments is possible. Please also see responses to other transportation comments in this document on pp. C.&R.65-71.

## Street Operations

### Comment

And you know, Sacramento Street, that particular portion of Sacramento Street is narrower. If you take a look at it, it seems it is -- it just doesn't seem. It is narrower, and it has a lot of vehicular traffic, as well as pedestrian traffic. (Enid Lim)

Response

The portion of Sacramento Street adjacent to the project site is approximately the same width (i.e., about 28 feet curb-to-curb) as other sections of Sacramento Street in the project vicinity (Powell Street to Hyde Street). As described on EIR pp. 69 and 71, the project would reduce vehicular traffic on the portion of Sacramento Street adjacent to the Cathedral block (Taylor Street to Jones Street) by removing the Sacramento Street access to on-site parking spaces.

Comment

The EIR does not quantify the project's effects for the topics which can be measured in this fashion, as normally is required in City EIRs. For instance, the Draft EIR (page 67) states that traffic flows "well" and characterizes existing traffic conditions as "good" whereas the basis for arriving at that conclusion is not provided. EIRs prepared on other projects in the City use the "level of service" concept to define existing intersection operations and assess post-project conditions. Even if intersections in the vicinity of the site are operating at service levels which the City defines as "acceptable," omitting these service levels from the EIR requires readers to accept a conclusion for which there is no foundation. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

The incremental changes in traffic volumes that would be associated with the project do not warrant level of service calculations. As described on EIR p. 68, activities at Cathedral facilities would not increase markedly beyond existing peak levels, and thus, added vehicle trips generated by the project would not be noticeable within the daily fluctuation of traffic. In addition, observations of traffic flow conditions on a Sunday morning (9:00 a.m. to 11:00 a.m.), and Tuesday afternoon (4:30 p.m. to 5:30 p.m.) and evening (7:00 p.m. to 9:00 p.m.), peak activity periods at the Cathedral, found that traffic flowed well during these periods (see EIR p. 67). On this basis, presentation of detailed level of service computations in the EIR is not necessary for an accurate and adequate analysis of potential transportation impacts.

Comment

The EIR makes much to do about the one-lane existing entrance and two-lane proposed entrance on Sacramento and Taylor Streets, respectively. In fact, the EIR concludes (page 71) that "the proposed two-lane driveway on Taylor Street to the new parking garage would not be expected to result in conflicts between entering and exiting vehicles and traffic on this less traveled street" (emphasis added). This is misleading. Two-way traffic does not (and would not) occur simultaneously under existing (or post-project) conditions. This is because people arrive for scheduled events at appointed hours (resulting in all inbound traffic) and then leave when the events are over (resulting in all outbound trips). (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

While the majority of existing (and post-project) vehicles driven to the Cathedral for an activity or event on a weekday evening or for Sunday morning services are likely inbound to the site prior to the event and outbound from the site after the event, the commenters' statement that never are there (nor would there be) incidences of two-way traffic is misleading. Midday trips to and from the site by employees, visitors and service calls result in two-way traffic at the existing one-lane driveway on Sacramento Street and potential conflicts between vehicles on the driveway, and vehicles (including MUNI buses) on Sacramento Street. Observations at the site have noted vehicles exiting the on-site lot during the morning period. Conflicts with MUNI buses would not be expected with the new parking garage because its entrance would be located on Taylor Street.

Comment

The EIR under-estimates the project's effects on Taylor Street. The EIR suggests (page 71) that the addition of the VTEs attributable solely to the net increase in building area on-site created by the project would not have a noticeable effect on "this less traveled street" and "would not be expected to noticeably affect this [Taylor-California] intersection." However, the project would divert ALL drivers looking for on-site parking to Taylor Street, not merely those generated by the 17,500 square feet added by the Chapter House, school expansion, and under-stair meeting facilities. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)



Response

While some traffic conflicts were observed at the California/Taylor Street intersection (due to various factors including lane configuration changes at the intersection, limited visibility at the crest of the hill, and the relatively unusual use of traffic signal indications at the intersection, noted on p. 76 of the EIR), operations at this intersection were found to be good during all periods observed. Because current traffic volumes at the California/Taylor Street intersection are relatively low, total new traffic (i.e., diverted existing traffic and project-generated traffic) attracted to the on-site parking off Taylor Street would not be expected to noticeably affect operations at this intersection. As noted in the EIR and cited by the commenter, Taylor Street is a less traveled street than Sacramento Street.

Comment

The study states that enrollment at the Cathedral School will increase by approximately 30 students (from 210 to 240 students). The study should address traffic impacts resulting from parents picking up/dropping off their sons each school day. It should also discuss mitigations measures to decrease any traffic congestion resulting from pick-up/drop-offs. (James D. Lowé, San Francisco Municipal Railway)

Response

Traffic impacts resulting from parents picking up/dropping off their sons each school day are addressed on pp. 47, 48, and 75 of the EIR. As the EIR shows, the operation of the passenger loading zone currently does not present substantial conflicts with traffic on Jones Street, and the nine or fewer additional drop-offs/pickups that would result from the 30-student expansion with the project would not be expected to affect the operation of the existing passenger loading zone or existing traffic conditions. Because no potentially significant environmental effect is identified, no mitigation measure is required.

Conflicts with MUNI

Comment

Bus traffic. During rush hours, the No. 1 bus is supposed to have a two-minute headway. That means two minutes, every two minutes, there is another bus coming in, and you know our Municipal Railway is a banana railway, so they are coming in bunches. So consequently, there is a lot of bus traffic also. (Enid Lim)

Response

As shown in the current (1992/93) MUNI *Street & Transit Map*, in the project area, the 1-California bus operates on Sacramento and Clay Streets with an average frequency of every three minutes during the peak periods (i.e., 7:00 a.m. to 9:00 a.m., and 4:00 p.m. to 6:00 p.m.). EIR pp. 45, 46 and 70 identify Sacramento Street as a transit route. The project parking entrance on Taylor Street could potentially avoid some vehicle conflicts, including bus-auto conflicts, compared to existing conditions with access on Sacramento Street, as noted on pp. 69 and 71 of the EIR.

Comment

The EIR Setting (page 45) correctly identifies both California and Sacramento Streets as "transit preferential streets." The EIR impact section (page 71) gives disproportionate emphasis to Sacramento Street as a "transit preferential street", however, without analyzing effects on California Street. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

Transit vehicles operating on the section of California Street in the project area include the California cable car line only. The EIR discusses project effects on cable cars on California Street on p. 71. The EIR includes more discussion of Sacramento Street than California Street because existing vehicle access to the project site is on Sacramento, and therefore the effect of the project's proposed reconfiguration of vehicle access would relate more to Sacramento Street than to California Street.

Comment

The EIR speculates that use of the existing parking driveway "may" affect the flow of traffic (including MUNI) on Sacramento Street. The EIR arrives at this conclusions without foundation. Has MUNI collected information documenting delays or hazards on this block of Sacramento Street attributable to traffic entering or leaving the site? The EIR goes to lengths to demonstrate that project-generated traffic would not result in impacts (and, even, would have beneficial effects), but cannot show that existing traffic conditions constitute hazards and that vehicles entering and leaving the site currently conflict with through traffic traveling on Sacramento Street. Nevertheless, the EIR leaps to the unfounded conclusion that moving the site driveway to Taylor Street would eliminate "potential" impacts. This reasoning is flawed. Either there is an existing condition which is not disclosed or the EIR is biased in describing the supposed benefits of the project.

The EIR (page 76) states that "there could be visibility problems at the new garage entrance which could create the potential for vehicle-pedestrian conflicts on Taylor Street". However, this conclusion is not explained sufficiently to support the finding.

- Why might the project result in visibility problems? Is this due to the design of the garage and driveway. If so, how can this impact be mitigated through redesign of the project and/or relocation of proposed uses?
- Is the EIR attempting to say that there is a choice between providing a setback from Taylor Street or no setback? If so, is the EIR also attempting to show the secondary impacts of mitigation?

For purposes of argument, for instance, if the project's design flaw is the garage entrance setback from the sidewalk and if relocating the garage opening at the property line would eliminate the setback (thus reduce the impact), this mitigation measure would result in a secondary visual impact -- namely, moving the gaping garage entrance closer to the sidewalk and Huntington Park.

The assertion made by the EIR raises more questions than the report answers. For instance:

- Is there a history of pedestrian hazards at the existing Sacramento Street driveway?
- Are the conflicts attributable to the configuration of the Crocker Fence (with solid stone base and open iron work above) which limits sight distances for outbound vehicles?
- If there is a record of existing concerns, how would these problems relate to the proposed



garage entrance?

- Is the EIR mistakenly equating a one-way driveway (used only one-way when people arrive and one-way when people leave) with a two-way garage entrance which would operate the same way as the existing driveway? (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

#### Response

The first full paragraph of EIR p. 71, conservatively notes the potential for "conflicts with traffic (including MUNI buses) on Sacramento Street as entering vehicles may sometimes stop and wait for an existing vehicle to clear the driveway before being able to enter the lot." The basis for this assumption is the limited sight distance for drivers approaching the driveway from both Sacramento Street and the parking lot, caused by the Crocker Fence; the combination of a narrow width of the driveway and the presence of on-street parking immediately adjacent to the driveway; and the frequency of MUNI buses on this Transit Preferential street. While the EIR authors made this assumption, the EIR on p. 71 also notes that "no such driveway conflicts were observed" during Cathedral peak times. The proposed driveway for on-site parking on Taylor Street would be expected to eliminate these conditions, and the EIR states that the Taylor Street entrance would be expected to reduce the potential for traffic conflicts.

The possible visibility problem addressed in the EIR as it could relate to the proposed parking garage entrance is described in recognition of potential line of sight obstructions that could exist because the garage's entrance (below the new courtyard) would be at the back of the Taylor Street west sidewalk, and because of the Crocker Fence that would remain, also at the back of the sidewalk, just north of the garage entrance.

The language in the EIR acknowledges that there could be visibility problems at the new garage entrance which could create potential vehicle-pedestrian conflicts on Taylor Street. The EIR does not conclude that the possible visibility problem (potentially caused by the presence of on-street parking adjacent to the Taylor Street entrance) would be expected to result in a substantial number of accidents, or be considered a significant environmental impact for which mitigation would be necessary. Mitigation measures included on EIR pp. 81-84 are primarily included for significant environmental impacts, as appropriate.

The fifth full sentence of the first paragraph on p. 76 of the EIR is revised, and three new sentences are added to follow this revised sentence, as follows (revisions are underlined):

"There could be visibility problems at the new garage entrance which could create potential vehicle-pedestrian conflicts on the westside sidewalk on Taylor Street. As shown in Figure 3, p. 18 and Figure 5, p. 20, the garage entrance would be at the back of the sidewalk, just south of the end of the portion of the Crocker Fence to remain, both of which could affect visibility. Problems would be expected to occur more often for pedestrians walking south toward California Street because their line of sight could be partially obscured by the Crocker Fence. The problem would likely occur less often at night when the headlights of vehicles would help alert pedestrians of approaching vehicles."

## PARKING

### Parking Demand

#### Comment

The parking analysis appears to rely on methods better suited to commercial areas rather than residential neighborhoods much less very high density urban residential neighborhoods with particular features such as weekday morning street sweeping, daily peak period tow-away zones nearby (which, combined with street sweeping, shifts all on-street parkers into fewer available spaces), and regular (and frequently large) influxes of non-resident drivers competing for available on-street parking. The EIR implies that there is regular turn-over of on-street spaces, perhaps assuming that the on-street parking supply is only used by visitors to Nob Hill. Nevertheless, the EIR leaves readers with a distinct misimpression that the relationship between demand and actual supply is not tight in the neighborhood. This is not true.

The EIR (page 72) bases the analysis of parking demand and parking impacts on a "typical Tuesday evening" but does not report which streets are subject to mechanical street sweeping on Wednesday morning. This affects parking on a block-by-block basis throughout the two-block radius study area identified in the EIR, especially residents' use of "illegal" spaces. Once residents have found on-street parking in the evening, few return later that night to move their cars to "legal" spaces vacated by people attending meetings at Grace Cathedral. Furthermore, residents do not move their cars into "legal" spaces vacated by meeting-goers if they must move them again between 6:00 and 8:00 the following morning; instead, those "legal" spaces may remain empty all night. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

But some of our concerns are, such as Commissioner Fung asked about, the traffic impacts. The area, as you know, it is, so to say, oversubscribed with automobiles already. At our last survey done about ten years ago, it was already at 105 percent over the number of cars looking for parking spaces -- just for residents alone, was 105 percent. So that meant that residents were going around looking for parking spaces.

We also have mechanical street sweeping, which means that we have to jockey our cars around most nights of the week. We also have the major hotels in that area with lots of guests coming in, and because parking is at a premium or expensive, people are looking for on street parking before they will even look into a garage. So these are impacts that haven't been expressed. (Enid Lim)

Response

The commenters are referring to existing conditions which would not be noticeably affected by the project (EIR, p. 74). Survey data gathered for the EIR analysis did not include, and therefore, the EIR does not discuss parking turnover; surveys were conducted to determine parking occupancy in an area bounded by Washington, Powell, Bush and Hyde Streets, at the times of peak Cathedral use. As stated on EIR pp. 72 and 73, on-street parking occupancy in the study area was found to be 99 to 101 percent on Tuesday evening (7:00 p.m. to 9:00 p.m.) and Sunday morning (8:00 a.m. to 12 noon), respectively. (See EIR p. 72 (second paragraph) and p. 73 (first paragraph)). Thus, the EIR does not imply that parking is not "tight."

Posted parking restrictions related to street cleaning in the parking study area were noted on Pine Street, California Street, three blocks on Hyde Street, and one block on Sacramento Street; none of those restrictions apply on Wednesdays. Therefore, the Tuesday evening parking survey reflects conditions where residents would not need to move their vehicles on Tuesday evening to comply with street sweeping regulations. Likewise, hours during which tow-away restrictions apply do not coincide with parking survey periods, so this information is not applicable.

Comment

The EIR states (page 72) that five percent of spaces counted in the parking survey are metered. The EIR suggests that there are fewer spaces on Sunday mornings than Tuesday evenings.



Metered parking is free on weekdays after 6:00 P.M. and on Sundays. Our canvass of the EIR's two-block radius study area did not reveal any such spaces. Is the EIR contending that parking regulations for metered spaces are in force on Sundays? Where are they?

The EIR further states (page 73) that "there were actually 69 legal on-street parking spaces available and unoccupied in the project area." However, the EIR does not characterize whether these were spaces which permit unrestricted parking or whether, for instance, they are reserved for handicapped drivers. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

The reduced number of parking spaces in the project that are available on Sunday mornings compared to those available on Tuesday evenings is not a function of the metered spaces. There is no stopping allowed on the north side of Sacramento Street between Powell and Mason Streets between 6:00 a.m. and 6:00 p.m. every day; therefore those 21 parking spaces are available on weekday evenings, but not on Sunday mornings.

The fourth and fifth sentences of the first paragraph on p. 72 of the EIR are revised as follows (revisions are underlined):

"Approximately 95 percent of these spaces are unmetered, and five percent are metered; these metered spaces are free after 6:00 p.m. There are about 1,274 unmetered, residential permit parking district spaces (two-hour parking spaces for non-residents of the permit parking district); 84 unmetered white spaces (passengers loading and unloading); 73 unmetered yellow spaces (loading spaces, available for unrestricted use after 6:00 p.m.); 9 unmetered green spaces (short-term parking, ten minutes, available for unrestricted use after 6:00 p.m.); 61 unrestricted metered spaces (free after 6:00 p.m. on weekdays); 10 metered yellow spaces (loading spaces, available for unrestricted use after 6:00 p.m.); and 3 unmetered blue spaces (handicapped parking)."

The second sentence of the second paragraph on p. 72 of the EIR is revised as follows (revisions are underlined), to clarify the status of the legal on-street parking spaces observed to be available and unoccupied during the parking occupancy survey on a typical Tuesday evening:

"Although overall the survey showed a shortage of 20 parking spaces, there were actually approximately 73 legal parking spaces unoccupied and available for use in the vicinity of the Cathedral, of which 19 spaces allowed unrestricted parking; 45 spaces allowed two-hour parking until 9:00 p.m. (unlimited thereafter), except

for area residents with a residential permit parking sticker; eight were white spaces (passenger loading and unloading); and one was a blue space (handicapped parking)."

The third paragraph on p. 72 of the EIR are revised as follows (revisions are underlined and deletions are bracketed):

"An inventory of existing on-street parking supply on a Sunday morning within a two-block radius of Grace Cathedral indicates a total of about 1,495 legal parking spaces, or approximately 20 spaces fewer than found during the weekday evening, because of different parking regulations that are in effect on one block on Sunday mornings. This inventory was taken on December 12, 1991./4/ Approximately 95 percent of these spaces are unmetered, and five percent are metered, although these metered spaces are free after 6:00 p.m. There are about 1,255 unmetered [ ] ('grey-curb') spaces; 84 unmetered white spaces (passenger loading and unloading); 73 unmetered yellow spaces (loading zones, available for unrestricted use on Sundays); 9 unmetered green spaces (short term parking, ten minutes); 61 unrestricted metered spaces, available for unrestricted use on Sundays; 10 metered yellow spaces (loading zones, available for unrestricted use on Sundays); and 3 unmetered blue spaces (handicapped parking). The 930 public off-street parking spaces, noted above, are also available on Sunday mornings./4/"

The first three sentences of the first paragraph on p. 73 of the EIR are revised as follows (revisions are underlined), to clarify the status of the legal on-street parking spaces observed to be available and unoccupied during the parking occupancy survey on a typical Tuesday evening:

"Currently, on Sunday mornings, there is some surplus supply of on-street legal parking spaces even though the overall on-street parking occupancy for a Sunday morning was found to be about 99 percent, with about 1,475 parked vehicles and about 1,495 legal spaces. Overall, the survey results showed a surplus of about 20 on-street parking spaces. However, there were actually about 70 legal on-street parking spaces available and unoccupied in the project area, of which about 50 spaces allowed unrestricted parking; about 20 were white spaces (passenger loading and unloading); and one was a blue space (handicapped parking)."

#### Comment

The EIR (page 74) reports that the proposed garage driveway would permanently remove two on-street parking spaces from Taylor Street. Although EIR reports that on-street parking use is 101 percent in the study area, the impact from any loss of any on-street spaces -- no matter how

seemingly inconsequential -- is not assessed. This omission seems to reflect the EIR's preconception that people who use on-street parking are visitors to the Cathedral and would "shift" to the proposed garage. The EIR needs to provide evidence to support this bias, such as a bumper-by-bumper survey to identify how many vehicles have residential parking permit stickers (indicating that they are neighborhood residents) versus how many do not have such stickers (indicating that the vehicles belong to visitors).

In citing City Planning Code Sections 150 (d) and 151 about parking requirements (Page 75), the EIR does not indicate whether the applicant would be required to provide replacement spaces to compensate for the loss of two on-street spaces on Taylor Street. What is the significance threshold? How many spaces must be lost before any requirement (if one exists) would be triggered? Are there provisions governing cumulative parking losses in an area? (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

As stated on EIR p. 73, the project would increase the Cathedral's off-street parking supply by about 55 spaces, to 120 spaces. It is assumed that some of the people who would use these on-site spaces currently park in on-street spaces. The loss of two on-street parking spaces to accommodate the driveway for the proposed parking garage would result in a net increase in parking supply of about 53 spaces. A survey of parking users in the area is not necessary to determine this net new supply. The loss of two parking spaces in an area containing about 1,500 on-street parking spaces would be statistically insignificant. For a discussion of cumulative parking effects, see p. C&R.76.

The parking requirements of the *City Planning Code* are included in the EIR for informational purposes and relate to on-site parking only (not on-street parking).

Existing parking conditions in the project vicinity establishes the base condition against which project effects are judged. As stated on EIR p. 74, the proposed project is not expected to result in a perceivable increase in the number of people who drive to and park at the facilities, and therefore there would not be a noticeable increase in demand on the parking supply in the vicinity of the Cathedral. Increased daytime parking demand was estimated to be no more than five spaces, if all new employees would drive alone to work. This daytime parking demand would be accommodated in the on-site garage. No legislated threshold of significance exists for parking impacts (see pp. C&R.45).



Comment

Staff believes any excess or unneeded parking spaces should not be constructed. This is especially poignant considering there will be a surplus of 50 available spaces as acknowledged by and documented in this study. (James D. Lowé, San Francisco Municipal Railway)

Response

The comment is noted. As stated on p. 73 of the EIR, the project would increase the Cathedral's off-street parking supply by about 55 spaces to 120 spaces. Using existing mode split and parking location information for Tuesday evening meeting attendees and the typical 500-person maximum attendance, parking demand on a typical Tuesday evening is currently about 243 spaces (122 on-street spaces and 121 off-street spaces, in the on-site 65-space lot and other nearby off-street parking facilities). As stated on pp. 74 and 75 of the EIR, the proposed increase in on-site parking spaces is not needed to accommodate project parking demand. The *City Planning Code*, however, would require the proposed project to provide a total of 120 off-street parking spaces. The additional 55 parking spaces could reduce existing on-street parking impacts associated with Cathedral activities by lessening the existing parking demand for on-street parking spaces, or they could encourage some people to drive who do not drive now. In either case, because there would not be an increase in patrons of Cathedral activities during peak periods of use of the Cathedral, impacts would not be expected to be noticeable.

Comment

The parking demand establishes what would be used on the project site, and then it lists an overall demand for that area, and then what is available, both off site and on street. As part of the survey, was there any analysis done to the make up of the parking demand outside the project area, in other words, by residents there or by people who come into the area for other reasons or whatever? (Commissioner Fung)

Response

The parking occupancy studies conducted for the EIR analysis surveyed the number of vehicles parked in the two-block radius around the project site on the weekday evening when Cathedral facilities are consistently used by the largest number of people (i.e., Tuesday) and on Sunday mornings. The surveys established a baseline condition

against which project effects can be estimated. It is not necessary to determine the origin of vehicles parked in the survey area to determine these effects. The study accounted for all parked vehicles in the study area, including area residents and visitors to the area; it did not distinguish between the two.

Comment

[W]ould the Planning Department ever ask for an alternative whereby the full parking requirement generated by that particular project be accomplished on site as an alternative? . . . I'm talking about demand. (Commissioner Fung)

Response

The Department of City Planning uses the *City Planning Code* parking provisions to describe the parking required by specific projects. In some cases that requirement would not meet 100 percent of the estimated project demand. In some cases the number of proposed parking spaces would exceed demand. While an alternative with a smaller (or no) deficit, is conceivable, and could be required by the City Planning Commission, it is not standard City policy to include such an alternative. San Francisco has a voter-mandated transit-first policy. The Transportation Element of the Master Plan contains policies "to relate the amount of parking in residential areas to the capacity of the street system and land use patterns" (Objective 12). The Master Plan states (discussion of Objective 12) that "just as the street system cannot accommodate all potential traffic, so the City cannot provide for an unlimited level of automobile storage." The City attempts to guarantee needed spaces without requiring excesses.

Comment

Grace Cathedral currently subsidizes parking for employees by providing spaces in the existing lot. Employees should be encouraged to use public transit to the fullest extent. Assuming sponsor is not proposing to charge full market rate for parking, project approval should require transit subsidies for employees as well. This has recently become more cost effective via the "Commuter Check" program, which offers transit passes as an employer provided tax-free fringe benefit. In the bay area, this program is a RTA/MTC funded project. It is a convenient tax-deductible way for employers to provide a benefit for employees and promotes use of transit. (James D. Lowé, San Francisco Municipal Railway)

Response

The comment is noted. The Commuter Check program is one of several programs which allows employers to subsidize employee use of public transportation. Through such programs, employers may give employees twenty dollars per month in tax-free transit vouchers that can be redeemed toward any transit ticket or pass purchase of twenty dollars or more on any transit system in the Bay Area. Grace Cathedral Corporation is tax exempt and therefore would see no tax advantage in pursuing such an arrangement. Planning Department staff do not generally recommend any specific, individual program, but always encourage incentives to transit use.

Parking Garage OperationsComment

The EIR suggests (page 74) that the proposed parking garage would "attract existing drivers who would shift from parking on-street or parking in other nearby garages." As currently presented in the EIR, this conclusion exhibits some wishful thinking. People who presently pay to park in other area garages might shift to the project garage if the fee is the same as or less than as now paid. The EIR provides no data to support the premise underlying its conclusion that people who currently are using free on-street parking would begin paying at the new garage. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

Grace Cathedral would operate the proposed parking garage through a contract with a private parking company. The parking fee rates for the proposed garage have not yet been established, but would likely be set at market rates, similar to rates for other parking garages in the area. As stated on EIR p. 72, the rates for existing parking garages in the project area range from \$3.50 to \$6.00 per hour. The drivers who could be expected to shift from parking on-street would be people who would choose the convenience of on-site parking over the need to search for a free on-street space in an area of essentially fully-occupied on-street parking, or the need to walk to another garage after a nighttime function.

The first sentence of the second full paragraph on p. 74 of the EIR is revised as follows (revisions are underlined):



"It is expected that the new parking garage could attract some existing drivers who would shift from parking on-street or parking in other nearby parking garages because a portion of the drivers might choose the convenience of on-site parking over searching for a free on-street space in an area of essentially fully-occupied on-street parking, or walking some distance to another garage after a nighttime function."

This information does not change the analysis or conclusions of the EIR.

Comment

We also feel that putting the parking underground will give more parking to the cathedral than it has now on that little outside parking spot. And this might help some of the problems of cars parked all around the area, particularly on Sunday, where there is not enough parking. (Joyce Bickel, Nob Hill Association)

Response

The comment is noted.

Comment

My first objection to the location of the proposed 120 car parking garage is that it is located directly across from a heavily used children's park. To route more traffic across Taylor Street at the location proposed is to create a hazard for the many children who use the park daily.

The park is a refuge in a very busy area of the city. To put the garage at the proposed site on Taylor Street would create noise, pollution from cars idling as they waited to enter or leave the garage, and visually destroy the tranquillity of the only peaceful oasis the neighborhood has.

There are two, large parking structures within a one half block of the Cathedral, located on California Street. The area does not need another commercial garage. During daytime hours, the cathedral claims most parking would be used by staff. After five, the garage would be more available to the public, meaning circling, idling traffic would disturb the residents to an even greater degree during the evening hours.

If the Cathedral must have a parking structure, they should place its entrance and egress on California Street where it would not disturb the neighborhood. It is unconscionable to put the

entrance and exit to a one hundred and twenty car garage across the street from the only children's park in the neighborhood. Crossing the street to the park with cars lined up to enter the garage would cause great hazard for the children who use the park daily. I am astounded that the Cathedral would suggest and that the city would consider such a proposal. (Micki Esken-Meland)

Other things are the impact on Huntington Square. That is a valuable gem to the city. It is not just a neighborhood park. It is shared by Nob Hill, Chinatown. You see all the little preschoolers going up there because they have got a fantastic place for them to play. And open space is so limited in Chinatown, that they walk up those hills to get to that little park. And where they are proposing to put the garage entrance is going to be directly across from the park. And they claim in the EIR that there is not going to be that much impact, but we know that when you are going to have all those cars coming in and out, that there will be. It can't help but be an impact. (Enid Lim)

#### Response

The children's playground area of Huntington Park is on the Sacramento Street side of the park, separated from Taylor Street by approximately 12 feet of sloped grass above a two-foot wall. Park access from the Taylor side is mid-block about 25 feet away from (south of) the children's playground area and about 30 feet south of the proposed garage access. There are entrances to the park on each side of the block (on Sacramento, California, Cushman and Taylor Streets). Most pedestrians entering the park from the Taylor Street side would use the crosswalks at the Taylor/Sacramento and Taylor/California intersections. Mid-block street crossing could conflict with traffic on Taylor Street. There currently is a private 75-space surface parking lot for the Pacific Union Club adjacent to the Park. Access to the lot is on Cushman Street, south of Sacramento Street. This parking lot is between Chinatown and the Park compared to the proposed project garage west of the Park. People walking to Huntington Park from Chinatown would enter the park from the east and would not cross Taylor Street from the west. In view of the above, the proposed garage would not be expected to be a hazard to children.

Circling by vehicles is a function of drivers searching for an on-street parking space. The proposed parking garage would be a specific destination which would not generate such action by drivers, and could reduce circling by existing drivers who now search for

an on-street parking space. The EIR notes on p. 46 the existing low traffic volume on Taylor Street, and states on p. 71 that the project would not increase traffic substantially on this street. In addition, the garage would have an area inside the entrance for vehicles to be processed (i.e., to receive a parking stub) off Taylor Street. On these bases, the occurrence of vehicles idling in a line while drivers wait to enter the parking garage is expected to be minimal. The proposed two-lane driveway would provide efficient access and egress. The expected absence of queuing would mean little noise above existing levels and little increase in air pollution.

Providing garage access on California Street would involve placement of the new driveway at the California / Taylor Street intersection, where it could have a greater effect on traffic than at the proposed Taylor Street mid-block location. In regards to the commenter's opinion that the area does not need another commercial garage, the City Planning Commission would consider the appropriateness of the proposed garage for the site as part of project approval.

## PEDESTRIAN MOVEMENTS

### Comment

The EIR (page 48) misrepresents the number of pedestrians crossing the northern and southern legs of Taylor Street during the limited evening and weekend periods observed, thus underestimates the hazards at the intersection.

The EIR (page 67) states that drivers entering the intersection from the southern leg of Taylor Street "hesitate" and attribute this driving pattern to topography, the configuration of the intersection, and the unusual flashing yellow signal. Northbound drivers on Taylor Street may hesitate in proceeding through the intersection when the light is flashing, but they routinely drive through the crosswalk to stop within the level area of the intersection.

The EIR must re-estimate and reassess the effect of increased volumes using the intersection on both traffic and pedestrian conditions. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)



Response

Observations of pedestrian traffic at the Taylor Street / California Street intersection were made on a Tuesday afternoon between 4:30 p.m. and 5:30 p.m.; a Tuesday evening between 7:00 p.m. and 9:00 p.m.; and a Sunday morning between 9:00 a.m. and 11:00 a.m., representative of typical peak periods when activities occur at the Cathedral. On p. 48 of the EIR, pedestrian traffic conditions on those days are described. The EIR, on p. 67, second paragraph, line four, describes that many vehicles were observed to stop on the level area of the intersection, within the pedestrian crosswalk, when the traffic signal turned red.

The last sentence of the first paragraph on p. 71 of the EIR is revised as follows (revisions are underlined):

"The project (including existing traffic diverted from the current parking lot access on Sacramento Street to the proposed parking garage access on Taylor Street) would not be expected to noticeably affect this intersection; the traffic that would approach the intersection on northbound Taylor Street, however, would be expected to continue to infringe on the pedestrian crosswalk at the southern leg of the intersection because of the steep grade on that approach."

Traffic volumes, as noted on EIR p. 69, second paragraph, would not change substantially from existing conditions, and while existing traffic conflicts at the Taylor-California intersection would continue with the project, the effect of the project on these conditions would not be likely to be noticeable within daily fluctuations in traffic.

## CONSTRUCTION IMPACTS

Construction TrafficComment

The EIR's discussion of construction period transportation impacts states (page 77) that "there are no curb lane or other lane closures anticipated, and the existing parking lot could be used [as a truck- and material-staging area] during this [demolition] phase." This assertion is not consistent with other of the EIR's conclusions -- namely, that normal use of the existing driveway on Sacramento Street "may" cause traffic hazards or conflict with MUNI operations. Is the driveway wide enough for haul trucks to pull into or out of the site onto upbound Sacramento Street? Would the turning angle into or out of the site be adequate to accommodate these trucks?

Would curb parking need to be limited after all? We specifically asked on page 4 of our response to the [Initial Study/EIR Requirement] that "the EIR should assess the comparative impacts of fewer trips by larger, ungainly haul trucks and other construction vehicles versus the impacts of more trips by smaller, more manageable vehicles . . . ." That request applies equally to both contexts (the haul route options discussed in our earlier letter and this comment, since the turning radius and driveway width may affect the sizes of trucks used during project implementation). (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

The existing 12-foot-width driveway would accommodate standard construction trucks, which includes concrete mixers as well as hauling and delivery trucks. The width of the street, with parking adjacent to and across from the driveway, is narrow enough, however, that there could be some short-term (i.e., during hours of construction truck movement, from 9:00 a.m. to 3:30 p.m.) loss of parking spaces in the immediate driveway area during certain phases of the construction. The number of truck trips (between 10 and 16 truck movements, five to eight round trips per day) could cause intermittent delays of about two to three minutes during truck backing movements into the driveway. Delays of two to three minutes could affect MUNI buses on Sacramento Street. Most construction traffic would occur on Taylor Street, however, with limited use of Sacramento Street, and construction truck traffic would be restricted to the hours between 9:00 a.m. and 3:30 p.m. to avoid peak-period effects, as stated on p. 83 of the EIR. The effect of intermittent delays during off-peak periods would not be substantial.

The level of analysis for transportation issues in the EIR corresponds to the magnitude and nature of potential impacts associated with the project. Since a maximum of about 10 to 16 truck movements are anticipated over the course of each day, further discussion of alternative hauling schedules and vehicles is not necessary. Scheduling issues would be more appropriately considered by the City Planning Commission in the context of the sponsor's application for Conditional Use Authorization. See also the response to the comment on pp. C&R.70-71.

Comment

The contractor should contact SF MUNI's Chief Inspector Art Curtis (415/923-6262) to coordinate construction schedules and to mitigate impacts on transit service. (James D. Lowé, San Francisco Municipal Railway)

Response

The comment is noted. As stated on Draft EIR p. 83, the project sponsor and construction contractor would meet with the Traffic Engineering Division of the Department of Parking and Traffic, the Fire Department, MUNI, and the Department of City Planning to determine feasible traffic management and mitigation measures to reduce traffic congestion during construction of this project. This comment has been forwarded to the project sponsor, as well. The response on pp. C&R.106-107 herein notes that this measure is now included on p. 76 of the EIR, in Chapter IV, Environmental Impacts, rather than on p. 83 of the EIR, in Chapter V, Mitigation Measures.

Construction ParkingComment

Elsewhere in the EIR, in discussing construction worker parking during project implementation, the report states (page 78) "it is expected that construction workers would park in the Masonic Garage located across California Street from Grace Cathedral." Aside from not evaluating the availability during the day or the secondary parking supply impact on people attending daytime functions at the Masonic Auditorium, the EIR implies that construction workers would pay to park there all day long. Would the project sponsor subsidize the cost of doing so? On what basis does the EIR assume that construction workers would not try to compete with residents (or with people who currently use the site's surface parking lot who would be displaced) for the limited supply of on-street parking spaces? These assertions must be quantified and their validity assessed in the EIR. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

Union labor contracts require contractors to provide parking for construction workers within three blocks of the work site. There would be a maximum of about



40 construction workers on-site per day (with an average 25 to 30 workers) during the 16-month period after the demolition and excavation phases. The contractor would pay for workers' parking and would include the cost in the fee for the project construction; construction worker parking would not directly affect on-street parking demand. A surplus of daytime parking is generally available at the 450-space Masonic Garage (\$4.00 per day if entering by 10:00 a.m. and leaving by 6:00 p.m.) and the 100-space Crocker Garage (\$5.00 per day if entering by 9:30 a.m. and leaving by 6:00 p.m.), although the number of available spaces varies depending on what events are being held in the area.

### Comment

The EIR does not analyze short-term construction period impacts on parking. Some of these omissions are as follows:

- In discussing construction period transportation impacts (page 77), the EIR describes that the site's existing parking lot would be used for staging and then would be developed with the project. However, the EIR does not indicate whether the meetings presently held in Cathedral House would be relocated elsewhere on-site (such as to Gresham Hall in the Cathedral church's crypt) or discontinued during project implementation (such as temporarily relocated off-site). If these activities would continue to be accommodated on-site, the EIR must assess the short-term construction period parking impacts from loss of 65 on-site spaces and an equivalent off-site parking demand until the proposed garage opens.

The EIR reports (pages 77-78) that "once the garage is built, the parking lane on Sacramento Street would be used for staging, mainly for use of the concrete mixer trucks." This impact is not quantified. How many parking spaces would be removed temporarily from the supply? What would be the impact of this short-term effect on the area's parking supply. Residents of downtown neighborhoods who do not have reverse commutes (and, thus, leave during the day for destinations elsewhere in San Francisco or the Bay Area) do not move their cars unless they are parked in restricted zones (such as downhill on Pine or Bush Streets which have tow-away zones during commute periods). Put another way, on-street parking serves as many residents' garages, and, because of the neighborhood's downtown location, many people walk or take MUNI. They may not move their cars for days. Once having found a "good" space, some residents even carpool, take cabs, etc., rather than use their cars and lose their spaces. This omission in the EIR, therefore, provides another example of the

flawed methodology used to assess parking supply and demand in this downtown residential neighborhood and must be corrected before the City can certify the EIR. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

### Response

To the extent possible, Grace Cathedral activities would be held on-site during project construction. Some meetings, however, would need to be moved off-site to a location to be determined. Parking demand generated by activities at the Cathedral would be expected to decrease in proportion to reduction in on-site activities during this period. The loss of the 65 on-site parking spaces during the construction period would displace vehicles currently parked on-site by people attending those functions that would continue during construction. These displaced vehicles would either compete for limited on-street parking spaces available or would shift into other off-street parking facilities in the area.

The last sentence on p. 77 of the EIR (continuing on the top of p. 78) is revised, and three new sentences are added, as follows (revisions are underlined):

"Once the garage is built, the parking lane on Sacramento Street would be used for staging, mainly for the use of the concrete mixer trucks. A total of three concrete mixer trucks would be used at any one time, requiring up to six parking spaces, at two spaces per mixer truck. The curb space between Taylor Street and the existing driveway to the on-site parking lot provides space for seven vehicles; these seven parking spaces would be used for staging of the mixer trucks. The loss of these spaces would reduce parking supply in the project area. The effects would be localized and temporary (limited to a maximum eight-month phase during the overall 20-month construction period)."

The parking occupancy surveys conducted for the EIR were used to determine how many parking spaces are occupied, and how many are available, during periods when typical activities at the Cathedral occur. The survey result show a "snapshot" view of parking conditions. This technique provides an adequate context for evaluating project impacts, and does not represent a flawed or inappropriate methodology.

### NOTE - Transportation

- /1/ Sarah M. Rockwell, Morrison & Foerster, letter to Hillary Gitelman, Department of City Planning, November 5, 1991.

## CUMULATIVE EFFECTS

### Comment

The EIR ignores cumulative impacts entirely. This is a fundamental deficiency, and the City cannot certify the EIR as complete until cumulative impacts are fully and clearly assessed and their significance is determined. CEQA specifically requires EIRs to examine effects of little or no significance but which, when combined with existing or projected conditions, either resulting from the project itself or from the project combined with other development. In a very high density urban environment such as our neighborhood, every incremental impact combines with sometimes extremely intense conditions. However, the City consistently downplays cumulative impacts or overlooks their significance outright. For instance, the EIR does not list reasonably foreseeable projects within the area of impact but assures readers that, as a transportation mitigation measure (page 83), the "project sponsor would coordinate with construction contractors for any concurrent nearby projects that are planned for construction or which later become known" (emphasis added). Just a few examples of cumulative projects with which we are familiar include the following:

- The Taldan Mason Street site. The Land Use Map (Figure 8, page 31) shows that construction is underway but does not mention this development in relation to the proposed project's implementation schedule. (It has only just become speculative when - or whether - the Taldan project will be completed.)
- PG&E's massive area-wide gas line replacement project on Russian Hill and Nob Hill. The EIR ignores the major ongoing project altogether.
- We understand that construction will resume shortly on Pleasant Street after only a brief respite. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

### Response

Section 15355 of *CEQA Guidelines* defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." *CEQA Guidelines* Section 15130(a) states that cumulative impacts shall be discussed when they are significant. In evaluating the proposed project, potential cumulative effects were considered for each environmental topic. Cumulative effects have not been downplayed or overlooked in the EIR. The proposed project is considered to be in-fill development of an urban area that is already built out.



At this time, there are no current major development projects known in the immediate vicinity of the project site. The first project referenced by the commenter (1045 Mason Street) is a project being undertaken by Taldan Investments, which has been undergoing bankruptcy proceedings. However, Taldan expects construction of 1045 Mason Street to be completed within approximately three months (by mid-March, 1993).<sup>/1/</sup> The second project referenced by the commenter (PG&E's gas line replacement), while potentially annoying to area residents, is an intermittent and areawide project that would result in cumulative construction effects only if gas line replacement were to occur in the immediate vicinity of the project site while the project were under construction. Any construction impacts of gas line replacement would be temporary. The cumulative effects of gas line replacement, combined with project construction, would not be considered significant.

There are currently several active permits for renovation work on Pleasant Street (the commenter's third point), the most recent of which was issued in October 1992. This permit involves the renovation of four bathrooms and one kitchen and the replacement of windows and a fireplace mantel at 75 Pleasant Street. Other active permits include those for renovation of a rear staircase at 34 Pleasant Street and the installation of new kitchens and bathrooms at 25-29 Pleasant Street. These renovation projects are not considered to be major projects and would not contribute to potential cumulative environmental effects of the proposed project, such as noise from jackhammers or truck traffic involving large trucks or many truck trips.

For the reasons stated above, the combination of the project's potential environmental effects with the effects of other past, current, and future probable projects in the area would not be considered cumulatively significant.

Since the proposed project would not result in significant cumulative effects, this topic is not discussed in a separate section in the EIR. However, the EIR does analyze cumulative effects for items on the Initial Study checklist (Appendix A of the EIR) for each EIR topic (e.g., shadow and transportation), and discusses only those cumulative effects which are relevant or potentially significant.

#### NOTE - Cumulative Effects

/1/ Victor Gonzalez, Taldan Investments, telephone conversation, December 10, 1992.

## GROWTH INDUCEMENT

### Comment

The EIR needs to explain the statement (page 79) "since concurrent use of all meeting spaces at their maximum capacity would be unlikely based on current use patterns . . . ." This is a critical assumption which apparently has been used throughout the EIR in determining the increased number of people (and cars) who would use the site after project implementation, if approved. If this conclusion is true, why is so much space proposed? For instance, one might conclude that either the project sponsor proposes to develop an excessive amount of space on the site -- overbuild -- or that the EIR under-reports the sponsor's full intentions and expected uses which would occur there. The project's cumulative effects cannot be estimated accurately until this question is resolved. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

### Response

As stated on p. 13 of the EIR, the project sponsor's objective is to provide, in part, "improved office and meeting space for the Cathedral staff, Cathedral congregation and community groups" and "additional space for the staff and students of the Cathedral School for Boys." Current Cathedral use patterns described in the EIR are based on data provided by the project sponsor. This data is presented in Appendix C&R-C, "Representative Weekly Schedule of Events at Grace Cathedral and Cathedral House," on pp. C&R.134-139. The project sponsor has stated that the proposed project would relieve crowded conditions at the Cathedral site, and that the project would not increase use of the site beyond its current "peak use" of Tuesday evening and Sunday morning, except for the relatively small increase at the Cathedral School for Boys of about 36 students./1/

### Comment

The EIR is incorrect in stating (page 79) that "no intensification of use would occur simply because of the increased capacity" and demonstrates a misunderstanding of growth inducing impacts. Under CEQA, growth inducement refers to development which occurs where none is planned or which proceeds more rapidly than planned. Population increase may be a "symptom" of growth and ultimately can cause impacts termed "growth inducing impacts", such as by

creating new premature demands for public services. However, this EIR does not assess "growth inducing impacts."

Assuming for a moment that the project would indeed stimulate such premature or unplanned growth, the resulting impacts attributable to the project would occur off (not on) the site. For example, to the extent that intensification of on-site development set a precedent as a result of which landowners or developers in the vicinity of the site proposed larger projects than they could have built otherwise, the additional increment of development, in this case, the increased intensification, would constitute a "growth inducing impact." The EIR simply does not assess growth inducing impacts of the project. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

#### Response

In the evaluation of growth-inducing impacts of a proposed project, *CEQA Guidelines* Section 15126(g) states that an EIR should discuss "the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment."

The Nob Hill area surrounding the project site is a relatively high-density, urbanized area in which additional development would be in-fill development limited by existing zoning and height and bulk restrictions. The Nob Hill area has been the subject of several rezoning efforts over the years to reduce development potential. In December 1985, the Board of Supervisors passed Resolution No. 541-85, which replaced portions of the 160-A Height and Bulk district on Nob Hill in the project site vicinity with a 65-A Height and Bulk district. In November 1986, the Board of Supervisors approved a rezoning of lower Nob Hill along Pine and Bush Streets that replaced 80-A and 160-F Height and Bulk districts with a 65-A Height and Bulk district.

Growth inducement under CEQA is generally related to growth in undeveloped areas rather than developed urban areas, and includes causing a need for expanded community services or infrastructure. As noted on EIR pp. 79-80 and Appendix A, (the Initial Study) of the EIR, the project would not generate a need for new community services (such as schools) or for new personnel or facilities related to infrastructure (sewers, roads, etc.). The Initial Study found that the project would not induce substantial population growth. Also, the Initial Study acknowledged that the project could result in an increased demand for public utilities and services, but that such an increase would not



exceed amounts expected and provided for in the area. In light of the above, the EIR presents sufficient analysis of growth-inducing impacts. In addition, as noted above, the area has been down-zoned, curtailing growth potential. Any intensification of uses in the area would be subject to the requirements of CEQA and approval on a case-by-case basis.

Comment

What the EIR attempts but does not accomplish adequately is to evaluate the project's effects from proposed intensification of development on the site -- a topic which should be addressed in both land use and urban design analyzes. The EIR does not provide sufficient information about the Hobart plan for the site to compare the project and determine whether or not implementation as proposed would intensify site uses envisaged by the plan. The EIR makes it plain that the project would intensify development compared with existing conditions -- adding 55 parking spaces in a new structure compared with the existing surface lot, adding 4,300 square feet of meeting rooms by building a 19,100-square foot structure, etc. What the EIR omits is what the Hobart Plan envisaged for the site other than a reoriented church structure and a monumental new staircase. If buildout of the project as proposed would result in more development on the site than previously planned, the project would intensify site uses. Only then would it be possible to assess the project's potential to result in growth inducing impacts in the vicinity. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

The Initial Study found that since the proposed project would not alter the land uses at the site but would only rearrange them, the land use effects of the project would not be significant; the discussion of land use issues in the EIR is adequate and provided for informational purposes. The discussion of urban design impacts of the project is also adequate; these are described on pp. 53-54 of the EIR. For further discussion of urban design, also see pp. C&R.48-52.

A general discussion of the Cathedral Close plan is provided on pp. 39-42 of the EIR. The Hobart plan and the project's relationship to it are discussed in the Architectural, Historical and Cultural sections of the EIR and on pp. C&R.24-27. The Hobart plan did not specify a projected amount of development. This EIR evaluates the proposed project, including its potential for growth inducement and does not evaluate the Hobart

Plan, per se. Any further development, should it be proposed in the future, would be subject to the requirements of CEQA. Please see also the responses to the comments on pp. C&R.19-22.

NOTE - Growth Inducement

/1/ Sarah M. Rockwell, Morrison & Foerster, letter to Hillary Gitelman, Department of City Planning, November 5, 1991.

**TOPICS EVALUATED IN THE INITIAL STUDY**

As stated on p. 50 of the EIR, the Initial Study for the project, published on January 9, 1992, determined that an EIR would be required for the project, and also analyzed and determined that certain topics would require no further environmental analysis, and therefore would not be included in the EIR. The Initial Study is included as Appendix A on pp. A.1-27 of the EIR. Topics determined to require no further environmental analysis included: Land Use, Views, Glare, Population / Housing / Employment, Noise, Air Quality, Utilities / Public Services, Biology, Geology / Topography, Water Quality, Energy / Natural Resources, and Hazards. The EIR therefore does not discuss these topics, except for Land Use as an informational context for understanding project impacts. The Initial Study, although included in the EIR for the convenience of the reader, is a final, published and previously circulated, document not subject to revision. Comments on the topics determined to require no further analysis are included and responded to below.

NOISE

Comment

In our response to the generic, non-project-specific discussion of noise in the City's Initial Study/[EIR requirement] (pages 4-5) we specifically requested that the EIR should analyze a number of short- and long-term noise impacts of the project. Rather than providing environmental analysis, the EIR states (page 81) that "construction-related noise levels [would be mitigated] pursuant to the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code). This is not responsive. In addition to omitting a noise analysis, the EIR neither lists the provisions of this Ordinance applicable to the project nor assesses the effectiveness of the

measures to substantially reduce or avoid altogether increased noise levels during project implementation.

- Examples of short-term construction noise sources cited in our February 1992 letter include construction start-times before 7:00 A.M. and use of generators to operate flashing directional signals. Another -- idling of trucks -- appears to be addressed by air quality mitigation measures.
- An example of long-term operational noise cited in our February 1992 letter includes warning buzzers or bells. We specifically asked the City to recommend a "safe alternative to a buzzer, if proposed, including signs directing motorists leaving the garage to yield the right-of-way to pedestrians.

The EIR neither lists nor explains why issues we identified for analysis on the basis of the Initial Study were dismissed from study in the EIR. For instance, among the specific noise analyses we requested was to disclose whether the project sponsor would install a buzzer at the garage entrance (this is done), to assess the noise generated by a buzzer, traffic movements, revving of engines, and honking at the garage (this is not done), and to recommend a safe alternative to a buzzer (this is not done). We originally raised the issue because the Initial Study scoped noise out of the EIR without providing a sufficient factual basis for doing so. The EIR presents no noise measurement data about the acoustical environment in the vicinity of the site under existing conditions and does not project future noise levels after project implementation, thus perpetuating the Initial Study's omission. A copy of our February 2, 1992 letter on the Initial Study/Notice of Preparation is attached and is incorporated in these comments on the Draft EIR by reference.

Underlying our concern is our experience with the adequacy of the City's Noise Ordinance to address actual conditions in our neighborhood (and probably in other neighborhoods throughout the City). The City concluded from the outset -- before analyzing the project -- that there would be no noise impacts. Because the EIR scoped noise out of the analysis and ignores comments by the residents who would be exposed to the resulting noise levels, readers continue to be left with inadequate information to provide a factual basis for determining what mitigation would be warranted and assessing the effectiveness of measures to actually mitigate impacts satisfactorily.

Since submitting our February 1992 [letter], we have seen "noiseless" battery-operated flashing signs being used in the City. The EIR does not mention (much less investigate the effectiveness of) requiring battery-driven signals during the construction period rather than signals operated by diesel generators. We have observed City Department of Public Works vehicles at roadwork



sites using these silent battery-operated signals. This suggests to us that City DPW personnel recognize that the conventional generator-driven signals result in inappropriately loud and unremitting noise levels in neighborhoods and have done something to correct this. However, the EIR neither recommends this as an independent mitigation measure nor indicates that adherence to the Noise Ordinance would require it. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

### Response

As noted elsewhere in this document, Department staff responded by letter, dated June 5, 1992, to the commenter's concerns about the Initial Study, and that letter is part of the project case file.

The Department of City Planning, Office of Environmental Review, determined as a result of the Initial Study for the proposed project (which is included in the EIR as Appendix A on pp. A.1-27) that the effect of the project on noise levels and for certain other environmental issues would not be significant and would require no further environmental analysis. Although the Initial Study states that there would be an increase in noise as a result of implementation of the proposed project, this increase would not be considered significant.

As noted in the Initial Study on p. A.13, a doubling of existing traffic volumes would be necessary to produce a noticeable increase in environmental noise; a traffic increase of this magnitude would not occur as a result of the proposed project. As noted on p. 81 of the EIR and in Appendix A on pp. A.1-27 of the EIR, the project's compliance with the San Francisco Noise Ordinance (Article 29 of the *San Francisco Police Code*) would reduce construction and operational noise effects of the project, even though these effects would not otherwise be considered significant. Under CEQA, effects that are found to be not significant do not require mitigation measures. Appendix A (the Initial Study) identifies and summarizes applicable sections of the Noise Ordinance. Enforcement of the Ordinance is the responsibility of the San Francisco Police Department (SFPD). The Ordinance is enforceable upon complaint. Any noise generated by the project that exceeds noise limits should therefore be reported to the SFPD. If, in the opinion of the commenter, the Noise Ordinance is not effective, these concerns should be directed at the Ordinance through the Board of Supervisors.

It should be noted that short-term construction noise effects identified by the commenter would be temporary and occur intermittently throughout the construction period.

Buzzers or bells (the long-term operational noise effect identified by the commenter) are not specifically identified as the type of warning device for the garage driveway in the mitigation measure on p. 84 of the EIR; the use of these types of devices is therefore not a certainty. Visual warning devices (such as signs or lights or the flashing signs suggested by the commenter) could be suggested to the City Planning Commission as a condition of approval in conjunction with its review of the sponsor's application for Conditional Use authorization.

Comment

Yes. I'm Charlie Hurst, also of Nob Hill Neighbors with Enid Lim. And I want everyone present to know that although slightly moribund, we are not defunct. We are still there and watching very closely. I hesitate to follow my good neighbor, Bill McCormick. We have had a sort of friendly adversary relationship for a great number of years. He, of course, is a property owner and a very important member of the Nob Hill Association. Many of us in Nob Hill Neighbors are renters and function as pillars of the Nob Hill activist group.

On a personal basis, I am very concerned about the cathedral's plans for all of the stated reasons. I would like to refer you to the two letters dated February and then August that we have sent to Ms. Sahm, which absolutely exhaustively state our positions on the matter of the Draft EIR. To add to that, I would like to speak as a close neighbor. Like Mr. McCormick, I live on Pleasant Street, formerly a very pleasant street, one block westbound, between Taylor and Jones.

That street and the entire neighborhood have been subjected to the most extraordinary construction uproar for almost ten years. It has been never ending, twice right on our street, as luck would have it, on either side of the building that I live in, one condominium building at the corner of Jones and Pleasant and another, what some of us call the "showboat" at 75 Pleasant Street. These buildings took forever to build. The noise was uninterrupted.

No. 75 Pleasant was built with non-union labor, which means that the workmen came in sometimes at 6:00 in the morning. They stayed until 7:00 or 8:00 o'clock at night. They worked on Saturday and Sunday. It was a nightmare, an absolute nightmare. The building has since had its problems, and it wasn't even very well built, after all that time. So that is a concern. I feel that many people in the neighborhood object to this. (Charlie Hurst)

Response

The comments are noted. Please see the response to the preceding comment, concerning construction noise.

Comment

Readers of the EIR must know what will be required of the project sponsor and the applicant's contractors as part of project approval, if approved. This is particularly important for neighbors who may need to take recourse during the construction period or thereafter. According to the Initial Study, the Ordinance defines excessive construction noise -- exclusive of impact tools (not defined by the Initial Study) -- as 80 decibels (dB) or higher at a distance of 100 feet. How is this enforced?

- Are police officers (equipped with noise measuring monitors) dispatched to sites in response to complaints?
- Are residents expected to distinguish between noise levels higher or lower than 80 dB?
- Would exposure to continuous or near-continuous noise levels of, say 75 to 79 dB constitute a significant adverse impact?
- Would successive day-long periods of higher noise levels generated by repeated use of impact tools constitute a significant adverse impacts?
- Would Saturday construction-generated noise constitute a significant adverse impacts? (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

By omitting potential noise impacts, the EIR does not divulge noise levels which would be expected during excavation of 24,500 cubic yards of rock or soil needed to excavate the garage to a depth of 30 feet below grade. The Initial Study did not estimate the noise level from that activity but only discussed proposed foundation type ([and] stated that the project would not require pile driving). However, the EIR does not provide information on site geology, particularly the depth of bedrock in relation to 30-foot excavations or the condition of underlying rock -- fractured and "ripable" for instance. As a result, it is not possible from reading the environmental document to determine how the material would be removed and to estimate the short-term noise impacts of doing so. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)



Response

Project approval requirements are identified on p. 25-26 of the EIR. Responsibility for enforcement of the San Francisco Noise Ordinance is discussed in the response to the comment on pp. C&R.94-95. In addition to Sections 2907 and 2908 (which respectively limit construction equipment noise to 80 dBA when measured 100 feet from such equipment and prohibit construction work between 8:00 p.m. and 7:00 a.m. if it creates noise that exceeds the ambient noise levels by 5 dBA at the nearest property line, unless a special permit has been granted by the Director of Public Works), Section 2915 of the Ordinance provides criteria for determining if a violation of the Noise Ordinance exists. Potential violations are evaluated upon responding to a complaint. The criteria to be considered by the person responding to a noise complaint include: the volume, intensity, repetitive nature, and duration of the noise; the volume and intensity of any background noise; the proximity of the noise to residences; and the nature and zoning of the area within which the noise emanates. Based on the provisions of Sections 2907 and 2908, exposure to noise levels between 75 and 79 dBA, exposure to noise generated by impact tools (which are required to have intake and exhaust mufflers approved by the Director of Public Works), and exposure to construction noise on Saturdays would not be expected to violate these Sections of the Ordinance and would not create a significant noise impact. If it were determined that these actions result in a violation under Section 2915, fines of up to \$500 for each day of violation may be imposed.

As stated on pp. A.12-14 in Appendix A (the Initial Study) of the EIR, average noise levels of construction activities (including excavation) has been measured between 78 and 89 dBA. The project would be required to comply with Section 2907 of the San Francisco Noise Ordinance, which limits construction equipment noise (except from impact tools, which are required to have intake and exhaust mufflers) to 80 dBA when measured 100 feet from such equipment, unless a special permit is authorized by the Director of Public Works. The Initial Study (pp. A.17-18) also includes preliminary information on site geology based on a Phase I Geotechnical Report for Grace Cathedral. Detailed information on site geology would be determined through foundation and structural reports, which would be prepared and completed prior to construction of the proposed project. The project sponsor would follow the recommendations of these reports regarding excavation and construction on the project site. If ripping of rock were to occur, noise from this activity would probably be annoying to nearby residents. If such activity were to occur in the construction pit, noise effects could be attenuated.

These effects would be temporary and intermittent during an approximately 12-week excavation phase of the 20-month construction period. As noted in Appendix A of the EIR, the proposed project would be required to comply with the San Francisco Noise Ordinance regarding construction noise.

#### Comment

As a resident of the 1190 Sacramento building, the construction of the proposed Cathedral garage would pose serious disturbances for me and my fellow residents. Our bedrooms are on the corner of Sacramento and Taylor Streets. Locating a commercial garage near that junction would impact us enormously. Noise from vehicles pulling into and out of the garage, idling as they await access, will be very disturbing. (Micki Esken-Meland)

#### Response

Please see the responses to the comments on pp. C&R.94-95 and C&R.97-98 concerning operational noise that would be generated by traffic under implementation of the proposed project. As noted on p. A.13 in Appendix A (the Initial Study) of the EIR, the noise environment of the project site is dominated by vehicular noise. Implementation of the proposed project would move access to off-street parking from Sacramento Street to Taylor Street and add additional off-street parking. However, it would not be expected to result in a substantial increase in the number of people who would drive to and from the site (see pp. 68-71 of the EIR). Traffic noise from vehicles entering and exiting the proposed parking garage would not be expected to differ noticeably from traffic noise from vehicles using the existing surface parking lot, and parking on streets or in existing garages in the area.

#### WIND

#### Comment

On page 15: The proposed demolition of Cathedral House and the proposed construction of broad and elaborate steps would probably create significant winds at Taylor and California, and at the east door of the Cathedral. The data of the Initial Study for the DEIR (p. A.15) are insufficient for proper consideration of these impacts. The outdoor "room" that now exists between the east doors of the Cathedral and the bulk of Cathedral House would be destroyed

## IX. Summary of Comments and Responses

west, and this amenity for persons exiting from Cathedral events would be eliminated east.  
(Vincent Marsh, Landmarks Preservation Advisory Board)

### Response

As discussed in the Initial Study, p. A.15, the project site is subject to high existing speed winds that accelerate up and over Nob Hill. While new development in the project vicinity would have the potential to create adverse winds or aggravate existing conditions, it is not anticipated that structures of the scale of the project would affect the local wind environment./1/

With the removal of the Cathedral House and the trees at the northeast corner of the Cathedral, wind speeds on the Cathedral steps could increase. The construction of the proposed Chapter House, the introduction of new landscaping, and the planned expansion of the Cathedral School would provide some protection from the predominant winds. According to the evaluation of potential wind impacts by an independent consultant, it is not anticipated that project-related wind effects on the steps would result in an increase or decrease of more than a few miles per hour, which would not be discernible./1/

## GEOLOGY

### Cathedral

### Comment

On page A.23: The proposed two-level underground garage would immediately abut the northeast tower and the north transept of the Cathedral, and it would lie about 6 1/2 feet from the buttresses of the north nave wall. The proposed excavation (described in the DEIR as 30 feet deep) and the construction would have unknown impacts on the structural stability of the Cathedral itself. A plan of the Cathedral's foundations should be in the FEIR. Potential impacts of the proposed excavation and construction on the Cathedral's structural stability should be discussed. Mitigations of such impacts should be included within the scope of the FEIR.  
(Vincent Marsh, Landmarks Preservation Advisory Board)



Response

As the Initial Study states on EIR pp. A.17-18, detailed foundation and related structural design studies would be prepared for the project by California-licensed geological and structural engineers. These subsequent studies would determine actual design and construction methods. The project sponsor would follow the recommendations of final foundation and structural reports regarding any excavation and construction on the site. Since these requirements ensure that there would be no significant effect related to excavation and construction, no additional discussion or illustration is required in the EIR. The Cathedral was constructed over several time periods: 1928-31, 1931-33, 1936-43, and 1961-64. The Cathedral is constructed of reinforced concrete, with some cut stone elements. Any required shoring or monitoring of the Cathedral structure would be described in the final foundation and structural reports.

Cathedral HouseComment

No information is provided on the structural condition of the Cathedral House which would substantiate why this building needs to be demolished. A seismic retrofit versus demolition is also not discussed.

On pages 50ff: Cathedral House could be seismically retrofitted. While its limestone facades have been spalling badly, the repair or covering of them, along with appropriate weatherproofing, could restore an attractive appearance to the building. (Vincent Marsh, Landmarks Preservation Advisory Board)

The EIR states (page 41) that Cathedral House, built of limestone blocks which have deteriorated, could be damaged in a major earthquake. To what extent does the deterioration of the building's limestone blocks relate to the structural integrity of Cathedral House? The EIR should describe whether the Degenkolb report only compares the building's 1912 structural design with 1984 code requirements or whether it also addresses the feasibility of reinforcing -- seismically retrofitting -- Cathedral House.

To what extent does the apparent deterioration of the building's limestone blocks demonstrate neglect? The EIR should indicate whether the building's condition is the result of inadequate (or no) maintenance specifically because the building was planned for demolition?

The EIR must describe the condition of this building in sufficient detail, in part, to provide a factual basis for formulating and assessing realistic alternatives to the project as proposed.

(Stanley Herzstein and Enid Lin., Nob Hill Neighbors)

Response

The Cathedral House could be seismically retrofitted. Alternative B.2, on pp. 89-90 of the EIR, discusses the impacts of a project alternative that could involve retrofitting the Cathedral House. A limited structural evaluation of the Cathedral House was prepared by Degenkolb Associates in 1984 prior to the 1989 Loma Prieta earthquake. This evaluation, which is cited on p. 43 of the EIR, concluded that the Cathedral House should be able to withstand a minor and a moderate earthquake, but that due to the structure's rigidity, it would be subject to considerable damage and severe distress, including possible partial collapse, in a major earthquake, such as a repeat of the 1906 earthquake. Due to the Cathedral House's location, it could be subject to particularly strong ground motion because it may be near dynamic resonance with the rigid rock of Nob Hill.

According to the Degenkolb evaluation, in a major earthquake, damage to the building could result from the inherent weakness of the walls. The deterioration of the limestone contributes to the weakness of the walls, as do the lack of structural reinforcement of the walls and the lack of positive attachment of the walls to the frame of the building. With the deteriorated state of the limestone, the walls would "severely crack with portions falling outward in strong ground shaking." The evaluation found that the walls could be severely damaged resulting in extensive cracking and spalling of the concrete frame with a partial collapse as gravity load support is lost.

The Degenkolb structural evaluation found that the Cathedral House could be structurally reinforced and its facade repaired. Strengthening of the Cathedral House to improve its seismic performance could be combined with renewal of the spalled limestone. The limestone could be removed and a reinforced concrete wall could be installed by the shotcrete (gunnite) method against the brick backing. A new stone veneer could be

installed to simulate the limestone. The interior unreinforced masonry walls would also need to be braced. While the Degenkolb report concluded that it would be less costly to rebuild the Cathedral House than it would to fully strengthen the existing structure, it did not conclude that such strengthening would be impossible. The Degenkolb report does not address the feasibility of reinforcing the Cathedral House except to note that it would be possible, and that it would be expensive, especially if the carved decoration of the limestone is recreated. Information on the cause of the apparent deterioration of the building's limestone blocks, while of interest, is not necessary in order to determine project impacts, and is therefore not included in the EIR. The project sponsor has rejected this alternative because retention of the Cathedral House would not meet the project objectives, as noted on p. 90 of the EIR.

## ENERGY

### Comment

Finally, there is no discussion on energy consumption which would be required both in the demolition and new construction proposed for the site. (Vincent Marsh, Landmarks Preservation Advisory Board)

### Response

Energy consumption is discussed in the Initial Study on pp. A.18-22 of the EIR. As stated in the Initial Study, removal of existing structures would require an unknown amount of energy. Building construction would result in the consumption of about 42 billion Btu of gasoline, diesel fuel, natural gas, and electricity, equivalent to about 7,500 barrels of oil. Estimated daily natural gas consumption and monthly electric consumption of the project is described in Table 1 on p. A.20 of the Initial Study.

### NOTE - Topics Evaluated in the Initial Study

- /1/ Judy Kavanagh and Chuck Bennett, Environmental Science Associates, Inc., letter, October 18, 1991. This letter is on file and available for public review at the Department of City Planning, 450 McAllister Street, San Francisco.



## MITIGATION MEASURES

### ARCHITECTURAL, HISTORIC AND CULTURAL RESOURCES

#### Comment

I'm just wondering on this business on the fence, and I guess this is something that the project sponsor can answer, but I would like to put it in your question box. Looking at the fence, and the fence that needs to be saved, which I think is now about 40 feet, could it be put up around the school, because it seems as though the fence that is drawn in there is a rather plain looking fence, and that fence might look very nice up there. I am talking on that high point where the children play, if that fence could be up there. Then we could maybe save those 40 feet. And I think -- oh, I would like to point out that the doors the Ghiberti doors that we have at that church are a fantastic resource that will be wonderful to have available to us. (Commissioner Levine)

#### Response

The proposed project would remove approximately 130 linear feet of the Crocker Fence. About 90 feet of the removed fence would be relocated to the northern side of the Cathedral. At the time the Draft EIR was published, there was no proposal to reuse the remaining 40 feet. The project sponsor now proposes to reuse almost all of the remaining 40 linear feet; individual segments of relatively short lengths would be relocated to currently unidentified areas of the project site./1/

The elevated schoolyard is one area which could accommodate remaining portions of the fence, or could accommodate the full 130 linear feet. This relocation, which could be required by the City Planning Commission, would not, however, fully mitigate the project's effect on the Crocker Fence, because the fence's significance as a designated City Landmark is derived in part from its function as a boundary marker of the site of the original Crocker Mansion.

#### Comment

On page 8, 2nd paragraph, and pg. 82: it is usual to notify the President of the Landmarks Board as finds are uncovered. (Vincent Marsh, Landmarks Preservation Advisory Board)

Response

The first sentence of the first full paragraph on EIR p. 8 is revised as follows (revisions are underlined):

"Should evidence of cultural resources be found during testing or following commencement of excavation activities, the project sponsor would suspend all activities at the project site which the archaeologist and the ERO, in consultation with the President of the Landmarks Preservation Advisory Board (LPAB), jointly determined could damage such resources, and would implement an appropriate security program to prevent looting or destruction."

The first sentence of the fifth full paragraph on EIR p. 82 is revised as follows (revisions are underlined):

"Should evidence of cultural resources be found during testing or following commencement of excavation activities, the project sponsor would suspend all activities at the project site which the archaeologist and the ERO, in consultation with the President of the Landmarks Preservation Advisory Board (LPAB), jointly determined could damage such resources, and would implement an appropriate security program to prevent looting or destruction."

Comment

On page 9: It should be required that the Crocker Fence sections remain in situ, if this is not possible, in San Francisco, CA. (Vincent Marsh, Landmarks Preservation Advisory Board)

Response

Since publication of the Draft EIR, the project sponsor has proposed to relocate virtually all of the 130-foot length of the Crocker Fence proposed for removal to currently unidentified areas of the project site. Therefore, the third bulleted mitigation measure on p. 9 of the EIR, and the second bulleted mitigated measure on p. 81 and continuing to p. 82 of the EIR, are deleted.

Comment

The EIR does not clearly identify the significance of impact before and after mitigation. For instance, would measures under consideration by the applicant (pages 81-82) related to architectural and historic resources have any remedial effect whatsoever to diminish the severity

of impact on the Crocker Fence segment affected by the project? This omission makes it impossible for readers of the EIR to assess the effectiveness of individual mitigation measures to reduce impacts to levels of insignificance or the potential for measures to partly but not fully mitigate impacts. As a result, readers and decision-makers will not know whether additional mitigation measures are available and/or should be required or whether the project would exert an unavoidable significant adverse impact on the environment.

The EIR (page 81) presents two mitigation measures which are under consideration by the project sponsor. However, the EIR does not discuss the effectiveness of either measure in reducing the severity of impact. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

Chapter IV, Environmental Impacts, p. 51, states that removal of a portion of the Crocker Fence would significantly impact the Cathedral Close. Chapter V, Mitigation Measures Proposed to Minimize Potential Adverse Effects of the Project, p. 81-82, lists mitigation measures under consideration by the project sponsor regarding architectural resources, for documentation or off-site preservation of portions of the Crocker Fence. These measures, if implemented, would reduce the level of, but not eliminate, this significant adverse effect. Therefore, Chapter VI, Significant Environmental Effects, p. 85, concludes that alteration of the Crocker Fence would be a significant, unavoidable effect of the project. Other mitigation measures described in Chapter V (measures proposed as part of the project and measures under consideration by the project sponsor) would reduce to a level of insignificance or eliminate effects that could potentially be significant, either singly (as in the case of cultural resources) or as a group (as in the case of transportation effects).

TRANSPORTATION

Comment

The EIR states (page 83) that "the project sponsor and construction contractor would meet with the Traffic Engineering Division of the Department of Parking and Traffic, the Fire Department, MUNI, and the Department of City Planning to determine feasible traffic management and mitigation measures . . . ." These measures need to be identified in the EIR. Otherwise, it is impossible to determine the effectiveness of measures -- whether they would reduce impacts to



less-than-significant levels -- and any secondary impacts of the measures. This omission is entirely inappropriate in a public disclosure document and contrary to CEQA. The EIR should identify the radius within which such coordination would occur and what would be done to reduce traffic congestion. As an alternative to identifying specific measures at this time, the EIR must list the performance standards to which subsequently defined mitigation measures would be required to adhere.

The EIR similarly is vague (page 83) in stating that the "project sponsor would coordinate with construction contractors for any concurrent nearby projects that are planned for construction or which later become known" (emphasis added). This appears to be an empty measure. (Through its appearance in the EIR, however, this measure demonstrates that cumulative transportation impacts would occur during project construction and would need to be mitigated.) The EIR must define how and what the sponsor would do. Contractors building other project[s] will have their own schedules and budgets which they must meet, regardless of well-intended mitigation measures in other projects' EIRs. Those contractors probably could not be flexible in either their schedules or budgets to assist the project sponsor in mitigating this project's impacts. If this measure is not feasible, as it appears, the EIR must identify a substitute measure and describe its effectiveness. If the EIR cannot recommend measure(s) which would reduce impacts to a less-than-significant level, the impacts should be identified as unmitigatable. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

#### Response

In general, the City's Department of Public Works requires that project sponsors and construction contractors meet with various City agencies to determine feasible traffic management and mitigation measures to reduce traffic congestion during the construction of large projects involving the use of public right of way. This requirement is intended to reduce inconvenience resulting from non-significant construction impacts. For this reason, and because this meeting is already a standard City requirement, the EIR has been revised to omit this section of the mitigation measure, and to include a reference to this procedure in the discussion of project impacts.

The second and third sentences of the last bulleted paragraph on p. 8 of the EIR, continuing to p. 9, are deleted. The second and third sentences of the first bulleted paragraph under "Transportation" on p. 83 of the EIR are deleted. The following new

paragraph is added under "Demolition, Excavation and Construction Traffic/7/," before the last partial paragraph on p. 76 of the EIR:

"Prior to beginning construction of the project, the project sponsor and construction contractor would meet with the Traffic Engineering Division of the Department of Parking and Traffic, the Fire Department, MUNI, and the Department of City Planning to determine feasible traffic management and mitigation measures to reduce traffic congestion during construction of this project and other nearby projects. To minimize cumulative traffic impacts due to lane closures during construction, the project sponsor would coordinate with construction contractors for any concurrent nearby projects that are planned for construction or which later become known."

As stated on p. C&R.88, there are no current major development projects in the immediate project vicinity. Specific measures applicable to a particular project are determined on a case-by-case basis, and vary depending on the type of construction activity involved, the timing of the activity (i.e., what other projects, if any, are being constructed in the same area at the same time), etc. Currently, no other major development construction schedules in the project area are known which would be concurrent with project construction. Thus, the measure is conservative in covering such a situation were it to become known in the future.

This does not presuppose that cumulative construction transportation impacts would occur during construction of the project, but rather covers the contingency that such impacts, which would be temporary, and therefore not significant, could occur.

The EIR is conservative in that it includes mitigation measures that do not each necessarily correspond to individual significant effects, but which would reduce or eliminate effects, which when combined with other effects of the project might potentially be significant.

#### Comment

The EIR states (page 15) that the plaza proposed between the church and Chapter House buildings would not be used for parking. Retention of the driveway on Sacramento Street and the construction of the proposed port cochere through the Chapter House building would continue to permit both intended and unintended vehicular access to this area of the site. In order to discourage unauthorized vehicles from entering the plaza (and making turns into and out of the Sacramento Street driveway), a mitigation measure should be added to the EIR. It should require

the project sponsor to post a sign at the Sacramento Street driveway prohibiting vehicular access. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

### Response

The following mitigation measure is added to p. 84 of the EIR, as part of the group of transportation measures under consideration by the project sponsor:

- "• The project sponsor would post a sign at the Sacramento Street driveway prohibiting unauthorized vehicular access to the new courtyard."

### Comment

The EIR suggests (pages 76 and 84) that "installation of devices to warn pedestrians of approaching vehicles would minimize potential pedestrian/vehicle conflicts" at the Taylor Street driveway. Where installed elsewhere in the neighborhood (and San Francisco at large) these "devices" usually consist of loud bells or buzzers.

- First, the EIR does not indicate whether the conflicts would warrant installation of a warning device. Specifically, would the magnitude of impact be significant, thus requiring mitigation? The EIR implies that the conflicts would constitute a significant adverse impact if a measure to mitigate the impact is being considered. If this is the case, however, the EIR does not clearly describe the disposition of the impact after mitigation to indicate whether the severity of impact would be reduced to a less-than-significant level. The EIR states that "installation of devices [plural] . . . would minimize potential pedestrian/vehicle conflicts." Nevertheless, the EIR is imprecise about whether the measure which the applicant is merely considering would or would not be implemented and whether it would or would not be required.
- Second, the EIR does not assess the secondary impacts from this purported mitigation measure. These "devices" are exceedingly annoying and unpleasant to anyone within earshot. Because the EIR fails to recognize that people attending events at the site tend to arrive at the same time and leave at the same time, the EIR also neglects to analyze the cumulative noise impact of such a "device" operating continuously while 120 vehicles are leaving the garage (not to mention cumulative impacts from this and other sites). It is ironic that a use otherwise considered to be a serene oasis of contemplation would contribute so brazenly to the cacophony of urban clatter after a Sunday service. This irony would be lost on neighbors, however, when the continuous noise occurs at 10:00 P.M. on week nights when meeting-goers depart, when background noise levels have dropped from daytime exposure, and residents may already have gone to bed.
- Finally, the fact remains that pedestrians in California have the right-of-way. This means that the burden of mitigating the impact attributable to project implementation should be



placed squarely on the shoulders of drivers to keep them from operating their vehicles recklessly and without regard to the law. The measure should be re-worded, such as to say that:

Warning devices shall be installed at the garage exit to alert drivers to watch for pedestrians, and noise-emitting devices shall be prohibited. This measure shall be required to reduce the long-term safety hazards to pedestrians from project-generated traffic and to avoid altogether long-term cumulative noise impacts on pedestrians walking past the site, people living or working near the project, and people using Huntington Park in order to mitigate impacts to a less-than-significant level. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

### Response

As noted on p. 76 of the EIR, visibility problems could occur at the proposed parking garage entrance, which could result in potential conflicts between pedestrians walking on the west side of Taylor Street and vehicles entering and exiting the parking garage. It is not possible to project with accuracy to what extent they might occur. As one of a group of transportation measures, the project sponsor would consider installing warning devices at the parking garage entrance to minimize potential pedestrian/vehicle conflicts in order to help ensure pedestrian safety. The installation of these devices has therefore been identified as one of a group of transportation mitigation measures (p. 84 of the EIR). The type of device that would be installed has not been determined at this time and might consist of visual rather than auditory devices. If any auditory device were used, however, there is no indication that its intermittent signal would constitute a significant environment effect, either singly or in combination with other area noise sources. The City Planning Commission could require installation of a non-auditory warning device as a condition of approval of the project.

As the commenters state, pedestrians have the legal right-of-way. However, pedestrians are still subject to traffic control devices, such as "do not walk" signs. In the interest of safety, it is not inappropriate to warn pedestrians of approaching vehicles regardless of who has the right-of-way. The use of warning devices is a common method of alerting pedestrians when vehicles are exiting garages which typically have limited sight lines. Because potential pedestrian/vehicle conflicts would probably be due to possible visibility problems and not a lack of awareness of pedestrians, alerting drivers exiting the garage of pedestrians would not remove the potential for conflicts. A sign alerting

drivers to proceed cautiously out of the garage could also be required by the City Planning Commission.

NOTE - Mitigation Measures

- /1/ Although the project sponsor would attempt to relocate all of the remaining 40 linear feet of the Crocker Fence on site, small portions of the fence could chip off or otherwise be damaged during the removal process, or could be of such short lengths that their relocation would be infeasible. Thus, "almost" all 40 linear feet would be relocated.

ALTERNATIVES

Comment

If, as it appears, the cost of the project is not a consideration, at a minimum several other alternatives should be proposed that would be much more sympathetic. (Michael A. Tomlan, Ph.D., Society of Architectural Historians)

Response

In addition to the proposed project, the EIR evaluates the potential environmental effects of four alternatives on pp. 86-91, including the no-project alternative, an alternative in which the Crocker Fence would be retained in place, an alternative in which both the Crocker Fence and Cathedral House would be retained in place, and an alternative in which the portion of the Crocker Fence proposed for removal would be relocated to the perimeter of the project site along California Street. Thus, these alternatives have been evaluated. They are not, however, proposed.

Comment

The EIR's assessment of alternatives is inadequate and needs to be revised. First, the EIR does not identify the environmentally preferred alternative. In spite of its deficiencies (discussed below), Alternative B-2 appears to be the environmentally preferred alternative. Second, the alternatives do not appear to truly explore thoughtful, feasible, and importantly, realistic concepts for the site as mandated by CEQA. The reason for evaluating alternatives in EIRs is to assess the extent to which the alternatives could mitigate -- reduce or avoid -- the adverse effects of the project. The EIR fails to do this in a meaningful way but instead presents concepts which, upon

examination, have not been carefully defined and, thus, lack sufficient substance to compare with the project except in the most superficial ways. Before the EIR can provide City officials and the public with sufficient information to make sound, knowledgeable decisions about the project, the alternatives must be reformulated in greater detail and then reassessed. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

In identifying alternatives for inclusion in the EIR, thoughtful consideration was given to alternatives that would reduce or eliminate potential significant environmental impacts of the project. Alternative B.1 (Crocker Fence Retention in Place) and Alternative B.2 (Retention of Cathedral House and Crocker Fence) would eliminate in varying degrees the project's significant unavoidable effect on historic resources. Because Alternative B.2 would eliminate the significant unavoidable effect of the project, it would be considered "environmentally preferred" to the project. As required by *CEQA Guidelines* Section 15126(d), the alternatives in the EIR are at a sufficient level of detail to allow an adequate evaluation by decision-makers of the differences in potentially significant environmental effects among the alternatives and the proposed project. Also as required in Section 15126(d), the Alternatives Chapter of the EIR includes alternatives capable of substantially reducing or eliminating significant environmental effects even though they would impede attainment of the project sponsor's objectives.

Comment

The EIR compares the effects of the Alternative A, "no project" alternative, with those expected from the project as proposed. However, the analysis is internally inconsistent and, consequently, appears to be biased.

- The EIR states (page 86) that there would be no noise and air quality impacts from the "no project" alternative, but the City scoped noise and air quality effects of the project out of the EIR, thus not providing a comparable basis for assessing the relative merits of this alternative and the project.
- The EIR states (page 87) that the project sponsor has rejected the "no project" alternative because it "would not complete Hobart's 1926 plan for the Cathedral site . . . ." This is incomplete and misleading unless EIR balances the statement to add that the project sponsor failed to implement the Bodley plan for the site. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)



Response

As noted in the Initial Study on pp. A.12-16, there would be noise and air quality effects associated with the proposed project; however, these effects were determined not to be significant. Since the No-Project alternative would not result in changes to the project site, the noise and air quality effects that would be associated with the proposed project would not occur. This comparison is sufficient to allow an adequate evaluation of the proposed project and its alternatives by decision-makers.

Since one of the project sponsor's project objectives is to complete the general site layout of the Hobart Plan (not the Bodley plan), the statement referred to provides the sponsor's rationale for rejecting the No-Project alternative.

Comment

The EIR states (page 88) that Alternative B-1, the "Crocker Fence Retention in Place" alternative "could have a greater impact on MUNI operations (emphasis added).". However, the EIR analysis of the project went to lengths to demonstrate that project-generated traffic would not occur during peak periods and would not cause impacts. Furthermore, the EIR provided no bases to support its assertions that turning movements into and out of the existing paved parking lot during the Sunday morning and Tuesday evening study period account for hazards or conflicts with MUNI or other Sacramento Street traffic. How, then, could traffic with implementation of Alternative B-1 during off-peak times have a "greater impact on MUNI"? (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

The EIR does not identify any specific hazards or conflicts currently occurring at the entrance to the existing surface parking lot on Sacramento Street. However, p. 45 of the EIR states that Sacramento Street is a "Transit Preferential" street on which priority is given to transit vehicles over autos during commute and business hours on weekdays. It is the route of a major transit line to and from downtown. The flow of traffic in and out of the existing parking lot presents some potential for project vehicle conflict with traffic on Sacramento Street. The proposed project would have the garage entrance on Taylor Street, a local street on which MUNI buses do not operate, so the potential for conflicts

with priority traffic would be less compared with an alternative that would maintain a parking entrance on Sacramento Street.

Comment

The EIR appears to have created a "straw man" in Alternative B-2, the "Retention of Cathedral House and Crocker Fence" alternative. The EIR states (page 90) that one reason for the sponsor's rejection is that "this alternative would not provide improved office and meeting space." This reflects the deficiency of the assumptions made in formulating the alternative. The alternative could -- and (to be meaningful) should -- have been defined to assume rehabilitation, renovation, and improvement of Cathedral House. This omission thus predetermines the failure of Alternative B-2 to satisfy applicant objectives and means that this alternative was not a realistic alternative as required by CEQA. This alternative needs to be reformulated and reassessed. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

Alternative B.2, Retention of Cathedral House and Crocker Fence, discussed on pp. 89-90 of the EIR, would preserve the Cathedral House (rated "3" in the 1976 Department of City Planning Architectural Inventory, included in the *Here Today* survey, and (since publication of the Draft EIR), appears eligible for listing on the National Register of Historic Places a part of a historic district) on the site and retain the Crocker Fence (part of City Landmark No. 170) in its existing location. This alternative would therefore eliminate the significant unavoidable effect identified for the proposed project.

As noted in Table 1 on EIR p. 16, the proposed Chapter House would contain approximately 19,100 sq. ft. of space, consisting of office and meeting space and three dwelling units that would be occupied by guests of the Cathedral and Cathedral employees. The existing Cathedral House contains about 14,800 sq. ft., about 4,300 sq. ft. less than the proposed Chapter House. Therefore, even if the Cathedral House were renovated, it would include 4,300 sq. ft. less space.

In addition to not fully meeting the space requirements of the Cathedral, this alternative would not complete the new stairway leading to the main Cathedral entrance envisioned in Hobart's 1926 plan, and would not improve circulation and access to on-site parking by relocating it from Sacramento Street to Taylor Street.

However, the alternative was included because it would reduce significant environmental effects even though it might "substantially impede attainment of the project objectives" (*CEQA Guidelines* Section 15126(d)). As noted on p. 86 of the EIR, regardless of the sponsor's reasons for rejection, the City Planning Commission could approve an alternative instead of the proposed project if the Commission believed the alternative would be more appropriate for the site.

### Comment

The reasons for the sponsor's rejection of Alternative C stretch credulity and underscore the disingenuousness at the heart of the EIR -- flaws which undercut the objectivity of the entire environmental document. The EIR (page 91) states that ". . . the rusticated stones at the base of the fence and portions of the remainder of the fence would have to be recut and modified to conform with the slope of California Street. Such modifications to the fence would involve loss of some of the stone at the base of the fence and would otherwise alter the historic character of the fence" (emphasis added). Compared with these impacts of Alternative C, the project would result in the complete and permanent loss of 40 linear feet of the fence -- both base and ironwork -- compared with these impacts of Alternative C, and, by relocating a 90 linear-foot segment of fence in the site, would permanently change the historic character of the fence which marked the perimeter of the former Crocker mansion. Compared with the project, Alternative C, the "Relocation of Removed Site to Perimeter" alternative, would place part of the fence where the other parts of this fence once stood and would do so with only minor modifications to the stone base. This alternative would not adversely affect the "integrity" of the fence. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

The prospect of the removal of a large (130 ft.) section of the remaining original Crocker Fence is very distressing. When the lengths along California Street and Jones Street were removed, and when the Hobart Plan was devised in 1926, there wasn't as great a concern for historic preservation, among the public, as there is today. Alternative preserving the remaining fence (less than half of the original) in place should be more fully explored. Alternative B.1, specifically, should include an illustration showing how the staircase could be accommodated with the fence remaining in place. Even Alternative C. -- relocation of fence to site perimeter -- should be more fully explored. Even though the stones would be somewhat altered, at least it would restore some of the fence along California Street in original materials, which is preferable to the preferred project of relocating pieces to the interior of the block. Not enough information was presented on these important alternatives in the Draft EIR. (Michael Levin)



Response

With Alternative C, Relocation of Removed Fence to Site Perimeter, re-use of the Crocker Fence (including the iron fence and the rusticated stones at the base of the fence) and its modification to conform with the slope of California Street would require changes to its stone base and the ironwork itself, and would therefore affect the fence's integrity. The EIR describes this loss of historical character as reasons for rejection of Alternative C. Alternative B.1 would maintain the Crocker Fence at its existing location, requiring modifications to the proposed staircase and garage entrance. Sufficient details regarding this and other feasible project alternatives are provided to allow decision makers to evaluate and compare alternatives to the proposed project.

Since the time that the Draft EIR was published, the project sponsor has proposed to relocate almost all of the 130-foot portion of the Crocker Fence proposed for removal to as yet undetermined areas of the project site./1/ As noted on p. 86 of the EIR, regardless of the sponsor's reasons for rejection, the City Planning Commission could approve an alternative instead of the proposed project if the Commission believed the alternative would be more appropriate for the site.

Comment

Was there an alternative done whereby you moved the existing Chapter House and put it above new parking? (Commissioner Fung)

Response

The EIR did not evaluate this alternative, but does include Alternative B.2, EIR p. 89, which would retain the Cathedral House and the Crocker Fence, as well as provide the parking garage and school additions proposed with the project. An alternative which would move the existing Cathedral House over a new parking garage was not considered due to the structural complexity of such an alternative.

NOTE - Alternatives

/1/ Although the project sponsor would attempt to relocate all of the remaining 40 linear feet of the Crocker Fence on site, small portions of the fence could chip off or otherwise be

damaged during the removal process, or could be of such short lengths that their relocation would be infeasible. Thus, "almost" all 40 linear feet would be relocated.

## OTHER COMMENTS

### Comment

The EIR does not adequately evaluate the impacts of the proposed project on Huntington Park. The EIR only addresses shadow patterns and completely fails to analyze other short- and long-term impacts on use and enjoyment of the park. Huntington Park is used intensively throughout the day, seven days a week by people of all ages from Nob Hill, Chinatown, and beyond. They include parents, nannies, and day-care providers who routinely bring individual children and groups of children to the park and playground; readers and sunbathers who crowd on benches and lawns on weekends and holidays; walkers, joggers, and people who exercise along the walkways inside Huntington Park (not just the sidewalks around the park); visitors staying in nearby hotels and passing on cable cars who are attracted to Huntington Park, etc. Construction noise during project implementation will interfere with users' enjoyment, may result in people spending less time in the park, or may cause people to avoid the park altogether. The increased number of trucks on local streets delivering construction materials to the site and transporting debris off the site could discourage people from walking children to Huntington Park during project implementation. Relocating all vehicular access from Sacramento Street to Taylor Street after project completion similarly could discourage people, especially those caring for children, from using the park. These and other impacts on the users of Huntington Park are not analyzed. Given the scarcity of public park and open space on Nob Hill, the EIR's failure to assess the project's effects on the useability of this resource is a serious omission. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

### Response

The EIR adequately evaluates potential environmental impacts of the proposed project, including any potential significant effects on Huntington Park. As noted on p. 81 of the EIR, the proposed project would be required by law to conform with Article 29 of the *San Francisco Police Code*, which regulates construction-related noise levels. Construction of the proposed project would, therefore, not be expected to result in significant noise levels in the vicinity of Huntington Park and construction would be temporary and intermittent during the 20-month construction period (excluding the

construction period for the school). Traffic generated by construction activities and uses at the Close has been addressed on pp. 67-79 of the EIR, and mitigation measures have been identified on pp. 83-84. As noted on pp. 76-77 of the EIR, temporary transportation impacts would result from truck movements to and from the site (an average of about 16 daily truck movements) during demolition, excavation, and construction activities. These impacts would not be considered significant due to the existing amount of traffic in the vicinity and their temporary nature; uses at Huntington Park would therefore not be significantly affected by construction vehicles. Since implementation of the proposed project would not be expected to substantially increase traffic in the project vicinity, the potential for conflicts between Park users and traffic in the vicinity would not increase. The last mitigation measure on p. 83 of the EIR would further minimize interference with pedestrian traffic. As explained on pp. 75-76 of the EIR, implementation of the proposed project (including relocation of access to the Close's parking from Sacramento Street to Taylor Street) would not be expected to significantly affect pedestrian access routes in the project vicinity. Traffic associated with the proposed parking garage would therefore not be expected to result in significant impacts to users accessing Huntington Park.

Some parks in the City, especially in outlying areas, are in areas of relatively low traffic volumes. Some are in the center of the City, in close conjunction with parking and heavier traffic volumes (e.g., St. Mary's Square and Portsmouth Square). These parks continue to have heavy patronage.

Comment

I attended a meeting last night at Grace Cathedral regarding the above. I purchased my unit 12 months ago. Prior to my purchase I attended a meeting at the Cathedral and was told that the garage was to be constructed on Sacramento Street. I would not have purchased my unit knowing a garage was being built under my bedroom. Building the garage on Taylor Street will not only cause emotional stress but will monetarily damage my prestigious investments. I strongly suggest that your explore alternatives or proceed with your original plans. (Gary Hacker)



Response

According to the project sponsor, the Cathedral did not have a plan in which the proposed parking garage entrance would be located on Sacramento Street./1/ The proposed garage entrance, which would be constructed mid-block on Taylor Street, would be located across from Huntington Park and would not be adjacent to residential buildings in the project vicinity. The commenter's reference to loss of value of this investment due to the project cannot be documented. This comment is more appropriately directed to the decision makers and the commenter's letter as well as these comments and responses will be available to the City Planning Commission for its consideration during the project approval process. *CEQA Guidelines* Section 15136 states that economic or social effects of a project shall not be treated as significant effects on the environment.

The EIR analyzes three alternatives to the proposed project (EIR pp. 86-91), all of which would have vehicle access on Sacramento Street instead of on Taylor Street. As stated on EIR p. 86, regardless of the project sponsor's reasons for rejection, the City Planning Commission could approve an alternative instead of the proposed project if the Commission believed the alternative would be more appropriate for the site.

Comment

The cathedral is right in our midst, and it is one of our treasures on the hill. When we were meeting on a regular basis, this is where we held our meetings. And it's a real treasure to us there on the hill. But we are very concerned about what they will be doing with the close, and also, we have -- as you can tell, we did our studying. We went through that EIR a number of times. We have just handed in a 14-page comment on all of the points that we had concerns about. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

The comment is noted. Specific comments in the Nob Hill Neighbors letter are addressed under appropriate topics in this Comments and Responses document.

Comment

I am a resident of the area. . . . I have lived there since 1965. I have seen -- I have heard what has just been said. There is no street sweeping around there, as she says, and there have been some changes and so forth. However, just to make it short, I am supporting the Grace Cathedral project, as it is submitted to you, and they are, I understand, giving you a letter at this time to state their position . . . . thank you very much. (William McCormick)

Response

The comment is noted.

Comment

The Draft EIR provides only superficial information about the environmental effects of the project and, consequently, underestimates the impacts and their significance. Until answers and analyses address the questions and issues listed below, the EIR is inadequate and provides insufficient information for the public to review the merits of the project or for officials to make decisions about the project. (Stanley Herzstein and Enid Lim, Nob Hill Neighbors)

Response

The EIR discloses and analyzes the environmental impacts of the proposed project in accordance with CEQA, the *CEQA Guidelines*, and Chapter 31 of the *San Francisco Administrative Code*. The EIR has been prepared consistent with Section 15151 of *CEQA Guidelines*, which states that "an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible." The EIR has been prepared with a sufficient degree of analysis to provide decision-makers with information concerning the environmental consequences of the proposed project. Please see specific comments in the Nob Hill Neighbors letter, addressed under appropriate topics in this Comments and Responses document.

Comment

We also had another problem down Pleasant Street. This happened because of a goof in the Planning department, I'm sorry to say. A new member of the department, who didn't quite know

his onions, allowed a man to build what he said was going to be -- I don't know -- a loft in his top floor apartment. What he did was add a floor to his apartment or something. He then reamed out all the other apartments, built a deck facing Pleasant Street. He got away with bloody blue murder. So we need to watch this.

And, again, uproar. The workmen at that site were throwing things off the garage roof into the dumpster with great hazard to vehicular, let alone pedestrian traffic. I, myself, was nearly hit twice with a flying two by four that was coming off the roof. Now, I know that when and if the cathedral proceeds with its plan, it is going to be immaculately careful about any such construction difficulties. (Charlie Hurst)

#### Response

The comment is noted. As noted on p. 26 of the EIR, if the proposed project is approved by the City Planning Commission, the project sponsor would be required to obtain building and related permits from the Department of Public Works, Bureau of Building Inspection (BBI). These permits would provide the exact specifications of Close alterations that would be allowed. Construction site safety in San Francisco is regulated by BBI, which can be notified of any unsafe practices by site contractors, should they occur.

#### NOTE - Other Comments

/1/ Sarah M. Rockwell, Morrison & Foerster, letter to Hillary Gitelman, Department of City Planning, October 30, 1992.



#### D. STAFF-INITIATED TEXT CHANGES

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The second sentence of the first paragraph on p. 1 of the EIR has been revised as follows (insertions are underlined and deletions are bracketed):

"Grace Cathedral Corporation also proposes to demolish the existing approximately 14,800 sq. ft. Cathedral House and the existing Cathedral stairs, remove the existing surface parking lot (approximately 65 spaces), and remove approximately 130 linear feet of the approximately 490-foot-long Crocker Fence which partially surrounds the Cathedral property. [ ] Approximately 90 linear feet of the removed fence [ ] would be relocated to the new courtyard north of Grace Cathedral, and almost all of the remaining 40 linear feet would be relocated to currently unidentified areas of the project site."

The following sentence has been added as the third sentence of the first full paragraph on p. 2 of the EIR:

"The State Historic Preservation Officer (SHPO) has determined that the Close appears eligible for listing on the National Register of Historic Places as a historic district."

The first sentence of the second paragraph on p. 2 of the EIR has been revised as follows (insertions are underlined):

"The Crocker Fence is included in City Landmark No. 170 and, according to the SHPO, contributes to the significance of a historic district (which appears eligible for the National Register) and appears individually eligible for the Register."

The sixth sentence of the second paragraph on p. 2 of the EIR has been revised as follows (insertions are underlined and deletions are bracketed):

"The remainder of the removed fence would consist of individual segments of relatively short lengths totaling about 40 linear feet, or less; [ ] almost all of this portion of the removed fence would be relocated to currently unidentified areas of the project site."

The last sentence of the second paragraph on p. 2 of the EIR has been revised as follows (insertions are underlined):

"Because the Crocker Fence is included in the Grace Cathedral Close City Landmark No. 170, and, according to the SHPO, contributes to the significance of a historic district (which appears eligible for the National Register) and appears individually eligible for the Register, and because [ ] the fence's character depends on its location as a marker of the original Crocker Mansion, removal of the 130-foot-long segment, as proposed, would significantly impact this Landmark."

The first sentence of the third paragraph on p. 2 of the EIR has been revised as follows (insertions are underlined):

"The Cathedral House is not included in City Landmark No. 170, but the SHPO has determined that it is a contributing structure within a district that appears eligible for the National Register."

The following sentence has been added as the tenth sentence of the paragraph on pp. 2-3 of the EIR:

"Because the SHPO has determined that the Cathedral House contributes to the significance of a district which appears eligible for the National Register, demolition of the Cathedral House would significantly impact this historic resource."

The eleventh sentence (now the twelfth sentence) of the paragraph on pp. 2-3 of the EIR has been revised as follows (insertions are underlined and deletions are bracketed):

"[ ] Removal of the fence and demolition of the Cathedral House, along with other changes to the Close, might affect the eligibility of the Close for listing in the National Register."

The third bulleted mitigation measure on p. 9 of the EIR is deleted.

The first full sentence on p. 11 of the EIR has been revised as follows (insertions are underlined):

"As with the project, the Cathedral House, which the SHPO has determined is a contributing structure within a historic district which appears eligible for the National Register and is rated "3" in the Department of City Planning Architectural Inventory and identified in the *Here Today* survey, would be demolished with this alternative."

The fifth sentence of the last paragraph on p. 11 of the EIR has been revised as follows (insertions are underlined):

## IX. Summary of Comments and Responses

"The fence-portion of City Landmark No. 170 would not be altered and the Cathedral House, which the SHPO has determined is a contributing structure within a district which appears eligible for the National Register, would be retained on the site in this alternative."

The fifth sentence of the second paragraph on p. 12 of the EIR has been revised as follows (insertions are underlined):

"As with the project, the Cathedral House, which the SHPO has determined contributes to a district which appears eligible for the National Register and is rated "3" in the 1976 Department of City Planning Architectural Inventory and included in the *Here Today* survey, would be demolished in this alternative, and City Landmark No. 170 (of which the Crocker Fence is a part) would be altered."

The third sentence of the first paragraph on p. 13 of the EIR has been revised as follows (insertions are underlined and deletions are bracketed):

"As part of the project, Grace Cathedral Corporation proposes to remove portions of the Crocker Fence which partially surrounds the property, and relocate [ ] almost all of the removed fence to other locations on the project site./a/"

The third and fourth sentences of the first full paragraph on p. 15 of the EIR have been revised as follows (insertions are underlined and deletions are bracketed):

"Approximately 90 linear feet of the removed fence would be relocated [ ] to a new landscaped courtyard north of Grace Cathedral, and almost all of the remaining 40 linear feet would be relocated to currently unidentified areas of the project site./a/ [ ] The new landscaped courtyard would be constructed above the parking garage to the north of the Cathedral, in the area of the existing parking lot."

The sixth and seventh sentences of the paragraph on pp. 23-24 of the EIR have been revised as follows (insertions are underlined):

"The remainder of the removed fence would consist of individual segments of relatively short lengths totaling about 40 linear feet; almost all of this portion of the fence would be relocated to currently unidentified areas of the project site./a/ The 90-foot portion of the Crocker Fence that would be removed, and the area to which that part of the removed fence would be relocated to, are shown on Figures 2 and 3 on pp. 17-18."



The following sentence has been added as the third sentence of the first full paragraph on p. 24 of the EIR:

"Also, the SHPO has determined that the Close appears eligible for listing on the National Register of Historic Places as a historic district./3/"

The third sentence (now the fourth sentence) of the first full paragraph on p. 24 of the EIR has been revised as follows (insertions are underlined):

"The Cathedral House, which the SHPO has determined contributes to the significance of a district which appears eligible for the National Register, was rated "3" in the 1976 Department of City Planning Architectural Inventory and identified by the *Here Today* survey."

The following note has been added as the first Project Description note on p. 28 of the EIR:

"/a/ Although the project sponsor would attempt to relocate all of the remaining 40 linear feet of the Crocker Fence on site, small portions of the fence could chip off or otherwise be damaged during the removal process, or could be of such short lengths that their relocation would be infeasible. Thus, "almost" all 40 linear feet would be relocated."

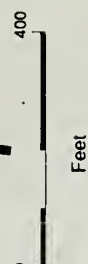
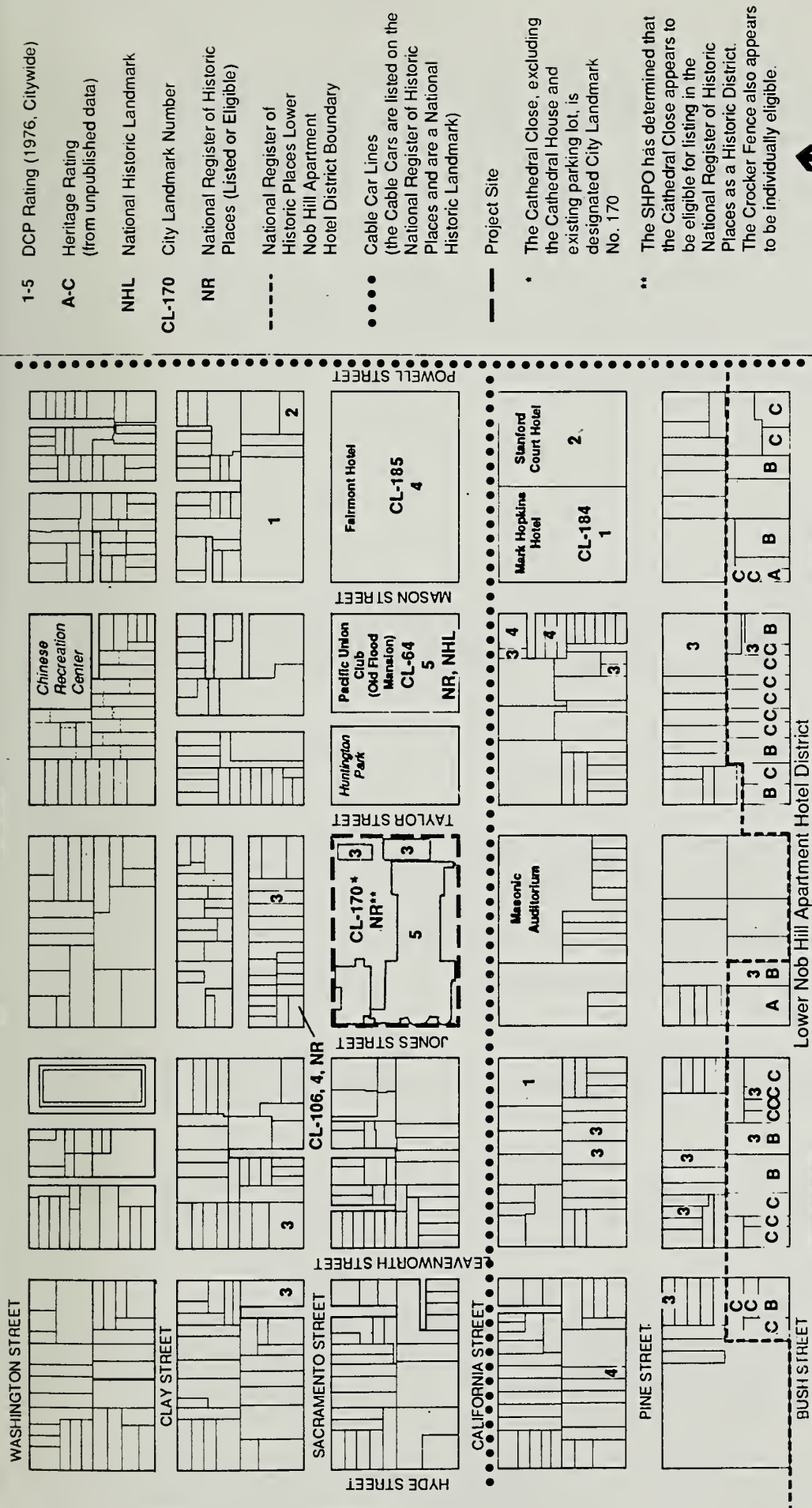
The following note has been added as the last Project Description note on p. 28 of the EIR:

"/3/ The SHPO has determined that the Cathedral Close appears eligible for listing on the National Register of Historic Places as a historic district in a letter dated October 28, 1992. Additionally, the SHPO determined that the Crocker Fence appears individually eligible for National Register listing as a rare survivor of the 1906 earthquake and fire. The letter containing this preliminary determination of eligibility and a copy of the nomination form submitted to the SHPO have been included in the project case file at the Department of City Planning, 450 McAllister Street, San Francisco."

Figure 10 on p. 34 of the EIR has been revised to indicate the apparent eligibility of the Cathedral Close for the National Register, as shown on the following page.

The last sentence on p. 35 of the EIR has been deleted and the following is added:

"The SHPO has determined that the Cathedral Close appears to be eligible for listing on the National Register of Historic Places as a historic district. The SHPO has further



Grace Cathedral

**Figure 10(Revised)**  
Architectural Resources in  
the Project Vicinity

SOURCE: San Francisco Department of City Planning;  
Splendid Survivors; Foundation for San Francisco's  
Architectural Heritage; National Register of Historic Places;  
Environmental Science Associates, Inc.

determined that the Crocker Fence, Cathedral House, Diocesan House, and the Cathedral are contributing structures within this district (i.e., they contribute to the district's overall significance). Additionally, the SHPO has determined that the Crocker Fence appears to be individually eligible for National Register listing as a rare survivor of the 1906 earthquake and fire./1a/

The following has been added as the last sentence of the third paragraph on p. 39 of the EIR:

"The SHPO has determined that the Crocker Fence appears eligible for listing on the National Register of Historic Places both individually and as a contributing structure within a historic district."

The third sentence of the first full paragraph on p. 41 of the EIR has been revised as follows (insertions are underlined):

"The Cathedral is included in City Landmark No. 170, and rated "5" in the 1976 DCP Inventory; as stated earlier, the SHPO has determined that the Cathedral appears to be eligible for listing on the National Register of Historic Places as a contributing structure within a historic district."

The following has been added as the fourth sentence of the last paragraph on p. 41 of the EIR:

"The SHPO has determined that the Cathedral House appears to be eligible for listing on the National Register of Historic Places as a contributing structure within a historic district."

The following has been added as the fourth sentence of the first paragraph on p. 42 of the EIR:

"The SHPO has determined that the Diocesan House appears to be eligible for listing on the National Register of Historic Places as a contributing structure within a historic district."

The following sentence has been added as the last sentence of the second paragraph on p. 42 of the EIR:

"The Cathedral School for Boys is located within the boundaries of the historic district that the SHPO has determined appears to be eligible for listing on the National Register of Historic Places; it does not contribute to the significance of the district by virtue of its more recent construction date."



The following note has been added as the second Architectural, Historic and Cultural Resources note on p. 43 of the EIR:

"1a/ The State Historic Preservation Officer (SHPO) has determined that the Cathedral Close appears to be eligible for listing on the National Register of Historic Places as a historic district in a letter dated October 28, 1992. The SHPO has further determined that the Crocker Fence appears to be individually eligible for National Register listing as a rare survivor of the 1906 earthquake and fire. The letter containing this preliminary determination of eligibility and a copy of the nomination form submitted to the SHPO have been included in the project case file at the Department of City Planning, 450 McAllister Street, San Francisco."

The second and third sentences of the first full paragraph on p. 47 of the EIR are revised as follows (revisions are underlined):

"An inventory of existing on-street parking supply within two blocks of Grace Cathedral indicates a total of about 1,515 legal parking spaces on weekday evenings and about 1,495 legal parking spaces on Sunday morning. There are approximately 20 fewer spaces on Sunday mornings than weekday evenings because of different parking regulations that are in effect on one block on Sunday mornings."

The following three sentences have been added as the second, third, and fourth sentences of the second paragraph on p. 50 of the EIR:

"The Cathedral Close appears to be eligible for listing on the National Register of Historic Places as a historic district. The Cathedral, Cathedral House, Diocesan House, and Crocker Fence are "contributing structures" within this district (i.e., they contribute to the district's overall significance). Additionally, the Crocker Fence appears to be individually eligible for National Register listing as a rare survivor of the 1906 earthquake and fire."

The following sentence has been added as the third sentence of the first full paragraph on p. 51 of the EIR:

"The SHPO has determined that the fence appears to be eligible for listing on the National Register of Historic Places both individually and as a contributing structure within a historic district."

The eighth and ninth sentences (now the ninth and tenth sentences) of the first full paragraph on p. 51 of the EIR have been revised as follows (insertions are underlined and deletions are bracketed):

"Almost all of [ ] the remaining 40 linear feet of the removed fence would consist of individual segments of relatively short lengths; [ ] these segments would be relocated to currently unidentifed areas of the project site. The portion of the Crocker Fence that would be removed is shown on Figure 2, p. 17; the area to which [ ] the 90-foot portion of the removed fence would be relocated to is shown in plan view on Figure 3, p. 18."

The first sentence of the last paragraph on p. 51 of the EIR has been revised as follows (insertions are underlined):

"Proposed alterations to the Cathedral Close, including the removal of the Cathedral House, a Tudor-Revival style structure, and the construction of the Chapter House and school additions, which would be designed in a Gothic-Revival style similar to the style of the existing Diocesan House, would change the overall configuration of the Close, and could affect the eligibility of the historic district for listing on the National Register of Historic Places."

The following note has been added as the first Architectural, Historic and Cultural Resources note on p. 53 of the EIR:

"/a/ The Cathedral Close may also be eligible for listing on the California Register. Pursuant to Assembly Bill 2881 (Frazee), resources that are listed or formally determined eligible for listing on the National Register of Historic Places by the Keeper of the Register are automatically listed on the California Register of Historical Resources, which was established by the same legislation."

The second bulleted mitigation measure on p. 81 of the EIR, which continues to p. 82 of the EIR, is deleted.

The third sentence of the second full paragraph on p. 88 of the EIR has been revised as follows (insertions are underlined):

"As with the project, the Cathedral House, which the SHPO has determined is a contributing structure within a district which appears to be eligible for listing on the National Register and is rated "3" in the Department of City Planning Architectural Inventory and identified in the *Here Today* survey, would be demolished with this alternative."

The first sentence of the paragraph on pp. 89-90 of the EIR has been revised as follows (insertions are underlined):

"Structures included in City Landmark No. 170 would not be altered (the 130-foot portion of the Crocker Fence that would be removed with the project would remain in its present location) and the Cathedral House, which the SHPO has determined is a contributing structure within a historic district that appears to be eligible for the National Register, would be retained on the site in this alternative."

The fifth sentence of the third full paragraph on p. 90 of the EIR has been revised as follows (insertions are underlined):

"As with the project, the Cathedral House, which the SHPO has determined is a contributing structure within a historic district that appears to be eligible for the National Register, and which is rated "3" in the 1976 Department of City Planning Architectural Inventory and included in the *Here Today* survey, would be demolished in this alternative."



## APPENDIX C&R-A: NATIONAL REGISTER CRITERIA

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According to *National Register Bulletin 16: Guidelines for Completing National Register Forms*, prepared by the National Park Service, Interagency Resources Division, National Register Branch, May 1990, National Register Criteria are as follows:

**Criteria:** The quality of significance in American history, architecture, archeology, culture, and engineering is present in districts, sites buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. that are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. that are associated with the lives of persons significant in our past; or
- C. that embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. that have yielded, or may be likely to yield, information important in prehistory or history.

**Criteria Considerations:** Ordinary cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National register. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- A. a religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- B. a building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- C. a birthplace or grave of a historic figure of outstanding importance if there is no other appropriate site or building directly associated with his or her productive life; or

- D. a cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- E. a reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- F. a property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- G. a property achieving significance within the past 50 years if it is of exceptional importance.

APPENDIX C&R-B: STATE OFFICE OF HISTORIC PRESERVATION LETTER

STATE OF CALIFORNIA — THE RESOURCES AGENCY

PETE WILSON, Governor

OFFICE OF HISTORIC PRESERVATION  
DEPARTMENT OF PARKS AND RECREATION  
P.O. BOX 942896  
SACRAMENTO 94296-0001  
(916) 653-8624  
FAX: (916) 653-9824



RECEIVED

OCT 30 1992

CITY & COUNTY OF S.F.

October 28, 1992

Mr. Vincent Marsh  
Landmarks Preservation Advisory Board  
City of San Francisco  
450 McAllister Street  
San Francisco, CA 94102

Dear Mr. Marsh:

Thank you for the materials submitted regarding Grace Cathedral Close. This district of five resources (four of which are contributing) appears to meet the requirements for listing in the National Register of Historic Places. The complex is significant in the history of religion in California, and also as an architecturally distinguished and unified collection of buildings largely designed by the master architect Lewis P. Hobart.

Only the Cathedral School for Boys, completed in 1966, would not contribute to the overall significance of the district by virtue of its more recent construction date. The remaining church buildings -- the Cathedral, Cathedral House and Diocesan House -- all contribute through their religious functions, architectural qualities, and their construction dates within the period of significance. The Crocker Fence, although built in 1877, would also appear to contribute. It has been well integrated into the design of the close, and it appears to be individually eligible as a rare survivor of the 1906 earthquake and fire.

The Grace Cathedral Close appears to have significance at the state level as the diocesan administrative center for one of California's major religious organizations. It would appear to have at least state level significance as well for the presence of Grace Cathedral, one of the state's outstanding works of religious architecture.

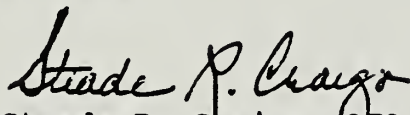
If you have any questions or comments, please phone Maryln



Vincent Marsh  
October 28, 1992  
Page Two

Bourne Lortie of my staff at (916) 653-8911.

Sincerely

A handwritten signature in cursive script, reading "Steade R. Craigo". The signature is written in dark ink and is positioned above the printed name.

Steade R. Craigo, MIA, Acting  
State Historic Preservation Officer

**APPENDIX C&R-C: REPRESENTATIVE WEEKLY SCHEDULE OF EVENTS AT  
GRACE CATHEDRAL AND CATHEDRAL HOUSE**

**REPRESENTATIVE WEEKLY SCHEDULE  
OF EVENTS AT  
GRACE CATHEDRAL AND CATHEDRAL HOUSE\***

<u>DAY/TIME</u>	<u>MEETING</u>	<u>NUMBER OF ATTENDEES</u>	<u>MEETING SPACE</u>	<u>FREQUENCY OF MEETING</u>
<u>Monday</u>				
7:30-8:00	Holy Eucharist	5-10	Cathedral	Daily
9:00-9:30	Morning Prayer	10-15	Cathedral	Daily
12:00-2:00	Episcopal Charities	25	Library	Monthly
12:00-2:00	Cathedral School for Boys Board Meeting	25	Dining Room	Monthly
12:00-1:30	Finance Committee	15	Lovgren	Monthly
12:10-12:40	Holy Eucharist	25	Cathedral	Daily
1:00-5:00	Organ Practice	1	Cathedral	Daily
5:15-5:45	Evening Prayer	5-15	Cathedral	Daily
6:30-8:30	AIDS/ARC Buddy Group	7	Pastor's Office Annex	Weekly

\* Excludes tours of Grace Cathedral, funeral services, wedding rehearsals and services, Cathedral School for Boys P.E. and day care, and events which take place in Diocesan House.

## IX. Summary of Comments and Responses

<u>DAY/TIME</u>	<u>MEETING</u>	<u>NUMBER OF ATTENDEES</u>	<u>MEETING SPACE</u>	<u>FREQUENCY OF MEETING</u>
<u>Tuesday</u>				
7:30-8:00	Holy Eucharist	5-10	Cathedral	Daily
7:45-9:15	Steering Committee	10	Library	3-4 times/yr.
9:00-9:30	Morning Prayer	5-15	Cathedral	Daily
9:15-10:15	Nominating Committee	8-9	Chapter Room	3-4 times/yr.
9:30-10:00	Calendar Meeting	14	Library	Weekly
10:00-12:00	Organ Practice	1	Cathedral	Daily
10:15-12:00	Chapter	7	Chapter Room	Weekly
12:00-2:00	Diocesan Task Force	8-9	Library	Monthly (Meets in Cathedral House when no meeting space available in Diocesan House)
12:10-12:40	Holy Eucharist	25	Cathedral	Daily
2:00-3:00	Chancellor's Hour	12	Library	Weekly
3:00-5:00	Hunger Commission	10-15	Library	6 times/yr
3:30-5:00	Organ Practice	1	Cathedral	Daily
4:00-5:30	Golf Classic Committee	10	Dining Room	Monthly



## IX. Summary of Comments and Responses

<u>DAY/TIME</u>	<u>MEETING</u>	<u>NUMBER OF ATTENDEES</u>	<u>MEETING SPACE</u>	<u>FREQUENCY OF MEETING</u>
4:00-5:30	Social Ministries	8	Chapter-	Periodically (Meets in Cathedral House when no meeting space available in Diocesan House)
5:15-5:45	Holy Eucharist	5-15	Cathedral	Daily
6:00-8:30	Stewardship Committee	8	Chapter Room	Monthly
6:00-7:00	Overeaters Anonymous	10-20	Library	Weekly
7:00-10:00	Tuesday Downtown AA	350-400	Gresham (overflow into Gym)	Weekly
7:00-9:00	Adult Education	7-8	Lovgren	Weekly
8:00-9:30	Adult Children of Alcoholics	35	Dining Room	Weekly
8:00-9:15	ALANON	15	Library	Weekly
<u>Wednesday</u>				
7:30-8:00	Holy Eucharist	5-10	Cathedral	Daily
9:00-9:30	Morning Prayer	5-15	Cathedral	Daily
9:30-10:15	Staff Meeting	40	Dining Room	Weekly
10:30-12:00	Bible Study	20	Lovgren	Weekly
12:00-2:00	Planned Giving Luncheon	50	Dining Room	Monthly

## IX. Summary of Comments and Responses

<u>DAY/TIME</u>	<u>MEETING</u>	<u>NUMBER OF ATTENDEES</u>	<u>MEETING SPACE</u>	<u>FREQUENCY OF MEETING</u>
2:00-4:00	Training Session for Capital Campaign	10	Library	Occasionally
5:15-5:30	Evening Prayer	5-15	Cathedral	Daily
6:30-9:00	AA	70-100	Dining Room	Weekly
<u>Thursday</u>				
7:30-8:00	Holy Eucharist	5-15	Cathedral	Daily
9:00-9:30	Morning Prayer	5-15	Cathedral	Daily
9:30-10:45	Organ Practice	1	Cathedral	Daily
12:10-12:40	Holy Eucharist	25	Cathedral	Daily
3:00-5:00	Organ Practice	1	Cathedral	Daily
5:15-6:00	Even Song	50-100	Cathedral	Weekly
6:00-6:30	Holy Eucharist	15-30	Cathedral	Weekly
6:00-7:30	Choir Dinner	44	Dining Room	Weekly
6:30-8:30	Lay Eucharistic Ministers Meeting	5-13	Library	4 times/yr
7:00-9:00	Choir Practice	38	Cathedral	Weekly

<u>DAY/TIME</u>	<u>MEETING</u>	<u>NUMBER OF ATTENDEES</u>	<u>MEETING SPACE</u>	<u>FREQUENCY OF MEETING</u>
<u>Friday</u>				
7:30-8:00	Holy Eucharist	5-10	Cathedral	Daily
9:00-9:30	Morning Prayer	5-15	Cathedral	Daily
9:00-2:00	Bulletin Assembly	1	Chapter Room	Weekly
9:30-12:00	Organ Practice	1	Cathedral	Daily
3:00-5:00	Organ Practice	1	Cathedral	Daily
12:10-12:40	Holy Eucharist	25	Cathedral	Daily
5:15-5:45	Evening Prayer	5-10	Cathedral	Daily
6:30-9:00	Bridge Group	8	Library	2 times/month
7:00-9:30	Narcotics Anonymous	50-65	Dining Room	Weekly
<u>Saturday</u>				
11:00-12:00	Sneak Preview of Video	50	Dining Room	One time only
<u>Sunday</u>				
8:00-9:00	Service	40-50	Cathedral	Weekly
8:00-11:00	Coffee Hour	75	Dining Room	Weekly
9:00-10:00	Service	100-150	Cathedral	Weekly
9:00-10:30	Inquiries Class	30	Lovgren	Weekly
9:30-2:00	Coffee Hour	300-500	Gresham	Weekly



## IX. Summary of Comments and Responses

<u>DAY/TIME</u>	<u>MEETING</u>	<u>NUMBER OF ATTENDEES</u>	<u>MEETING SPACE</u>	<u>FREQUENCY OF MEETING</u>
10:00-11:00	Bible Study	8-9	Chapter Room	Weekly
10:15-10:45	Choir Practice	38	Cathedral	Weekly
11:00-12:00	Service	550-600	Cathedral	Weekly
1:00-3:00	Luncheon for Concert Volunteers	30	Dining Room	One Time Only
1:30-3:00	Youth Group Pizza and Planning Lunch	37	Gresham	Occasionally
2:00-3:30	Organ and Choir Practice	38	Cathedral	Weekly
3:30-4:30	Service	100-150	Cathedral	Weekly

## X. APPENDICES

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APPENDIX A: Initial Study

APPENDIX B: Architectural Resources

APPENDIX A: INITIAL STUDY

NOTICE THAT AN  
ENVIRONMENTAL IMPACT REPORT  
IS DETERMINED TO BE REQUIRED

Date of this Notice: January 9, 1992

Lead Agency: City and County of San Francisco, Department of City Planning  
450 McAllister Street, 5th Floor, San Francisco, CA 94102

Agency Contact Person: Hillary E. Gitelman Telephone: (415) 558-6384

Project Title: Project Sponsor: Grace Cathedral  
91.121E: Grace Cathedral Expansion Project Contact Person: Paul Lobush

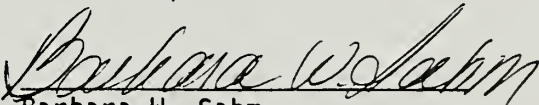
Project Address: 1051 Taylor Street; block bounded by Taylor, Jones,  
California, and Sacramento Streets  
Assessor's Block(s) and Lot(s): Block 246, Lot 1  
City and County: San Francisco

Project Description: The project proposal is to construct a new staircase to the Cathedral with approximately 6,500 sq. ft. of meeting rooms and a gift shop located below, a new 16,300 sq. ft. Chapter House and landscaped plaza north of the Cathedral, an underground parking structure (about 115 spaces) between the Cathedral and Sacramento Street, and approximately 11,250 sq. ft. in two additions to the Cathedral School for Boys. The project would require demolition of the Cathedral House, elimination of the existing stairs to the Cathedral and the space beneath them, removal and/or relocation of portions of the Crocker Fence which partially surrounds the Cathedral property, and removal of a 65-space surface parking lot. The existing Diocesan House and the Cathedral proper would remain unchanged. Vehicle access to the site would be relocated from Sacramento Street to Taylor Street.

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This determination is based upon the criteria of the Guidelines of the State Secretary for Resources, Section 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and the following reasons, as documented in the Environmental Evaluation (Initial Study) for the project, which is attached.  
Please see attached Initial Study.

Deadline for Filing of an Appeal of this Determination to the City Planning Commission: January 20, 1992.

An appeal requires: 1) a letter specifying the grounds for the appeal, and;  
2) a \$75.00 filing fee.

  
Barbara W. Sahm  
Environmental Review Officer



GRACE CATHEDRAL EXPANSION  
INITIAL STUDY  
91.121E

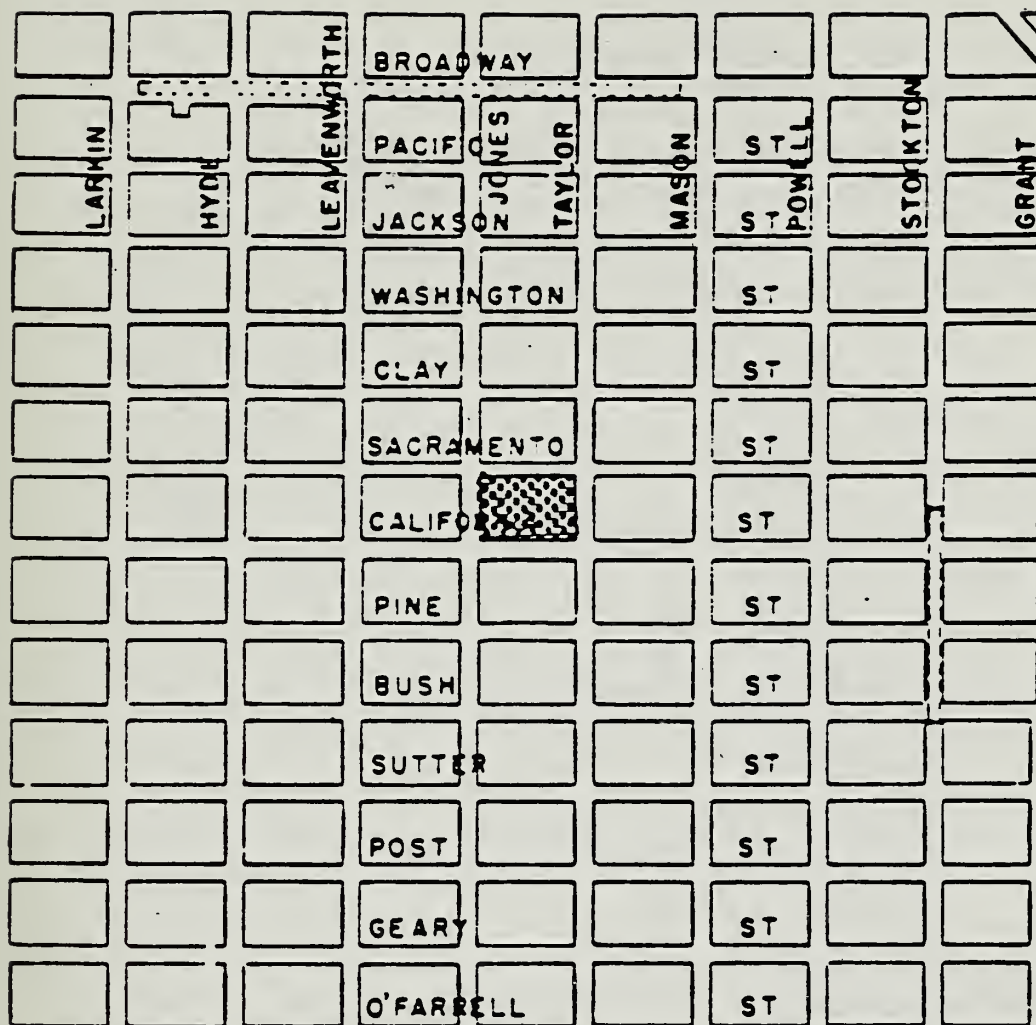
**I. PROJECT DESCRIPTION**

The proposed Grace Cathedral Expansion would include construction of a new staircase from Taylor Street to the main doors of the Cathedral, a new Chapter House and landscaped plaza north of the Cathedral with an approximately 115-space underground parking structure below, an approximately 11,000 sq. ft. addition on the east side of the Cathedral School For Boys, and an approximately 250 sq. ft. addition to the School's north side. The project would require the demolition of the Cathedral House, elimination of the existing stairs to the Cathedral, removal and/or relocation of portions of the Crocker Fence which partially surrounds the Cathedral property, and removal of a 65-space surface parking lot. The existing Diocesan House and the Cathedral proper would remain unchanged. The Cathedral Close, including the Cathedral, Cathedral School, Diocesan House, and Crocker Fence, and excluding the Cathedral House and the existing parking lot, is designated City Landmark No. 170.11/

The project site (Assessor's Block 246, Lot 1) is the block bounded by Taylor, Jones, California, and Sacramento Streets, at the summit of Nob Hill. (See Figure 1, p. 2.) The site currently contains the main Cathedral building, the Cathedral School For Boys (northwest corner), the Diocesan House (northeast corner), the Cathedral House (east side), and existing staircase (southeast corner), a 65-space surface parking lot which is entered from Sacramento Street west of the Diocesan House, and portions of the Crocker gate, walls, and fence. (See Figure 2, p. 3.) Huntington Park is across Taylor Street, east of the project site. The site is within an RM-4 (Residential Mixed, High Density) District. The site is also within a 65-A Height and Bulk District, which limits the maximum allowable height to 65 feet with certain bulk restrictions above 40 feet. The proposed Chapter House and school addition would not exceed 40 feet in height.

The proposed project would contain about 6,500 sq. ft. of meeting rooms and a gift shop facing Taylor Street beneath the new staircase. The three-story Chapter House, which would be approximately 35 by 170 feet in plan (oriented along Sacramento Street), would contain public rooms on the ground floor, offices above, and three residential units, for a total of about 16,300 sq. ft. (See Figure 2, p. 3, and Figure 3, p. 4.) The four-story school addition, which would be approximately 30 by 90 feet in plan (oriented perpendicularly to Sacramento Street) would contain seven classrooms and one administrative office. Another approximately 250 sq. ft. would be added to the School's library at ground level on the north side of the building.

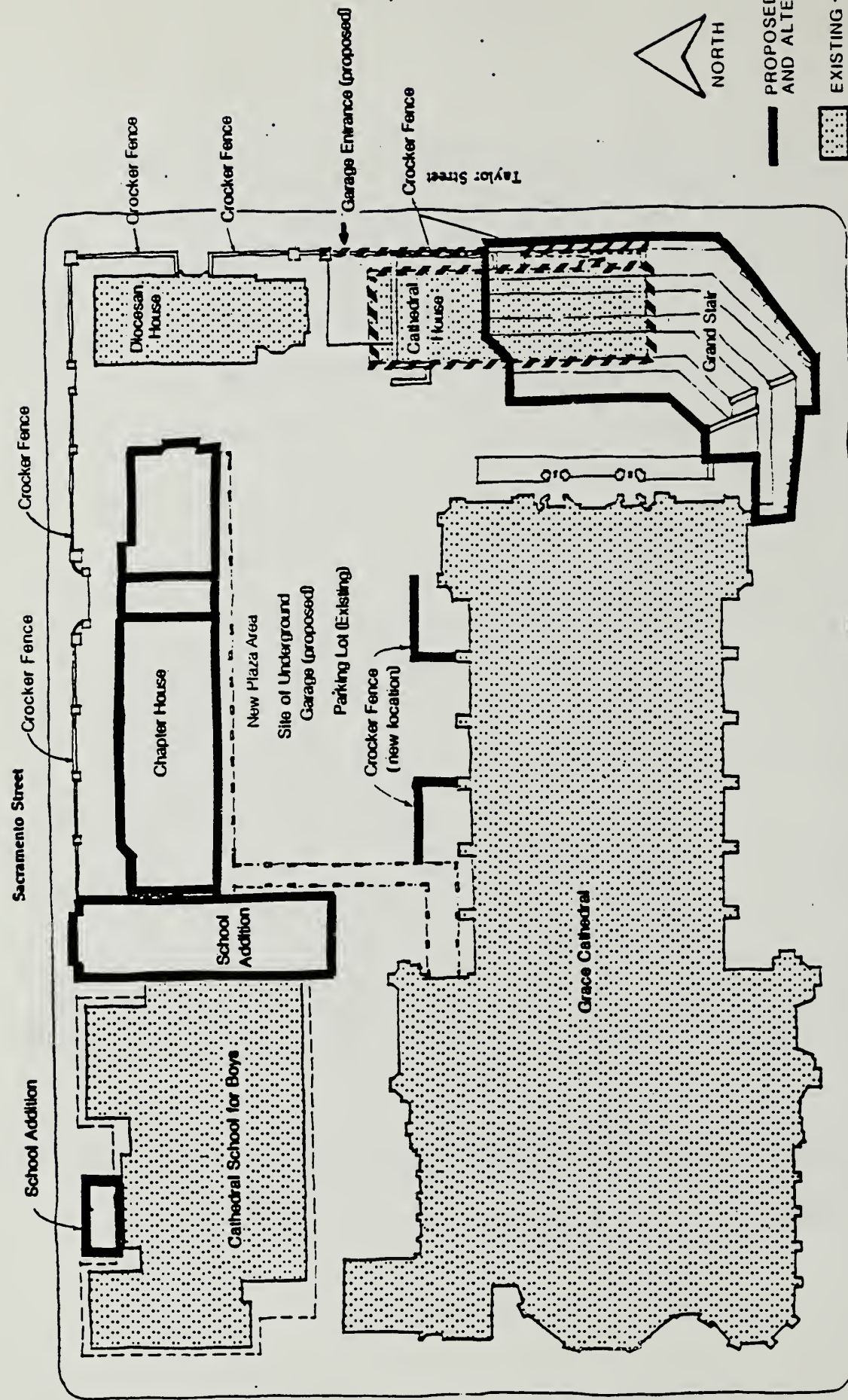
Following demolition and construction, the project would result in a net increase of about 13,750 sq. ft., of which approximately 11,250 sq. ft. would be additions to the Cathedral School for Boys. While they are included in this project for the purpose of environmental review (and the foundation for the larger addition would be constructed in coordination with the proposed parking structure), the school additions might be constructed several years after completion of other portions of the project.



# GRACE CATHEDRAL: VICINITY MAP

FIGURE 1

91.121E: GRACE CATHEDRAL EXPANSIO



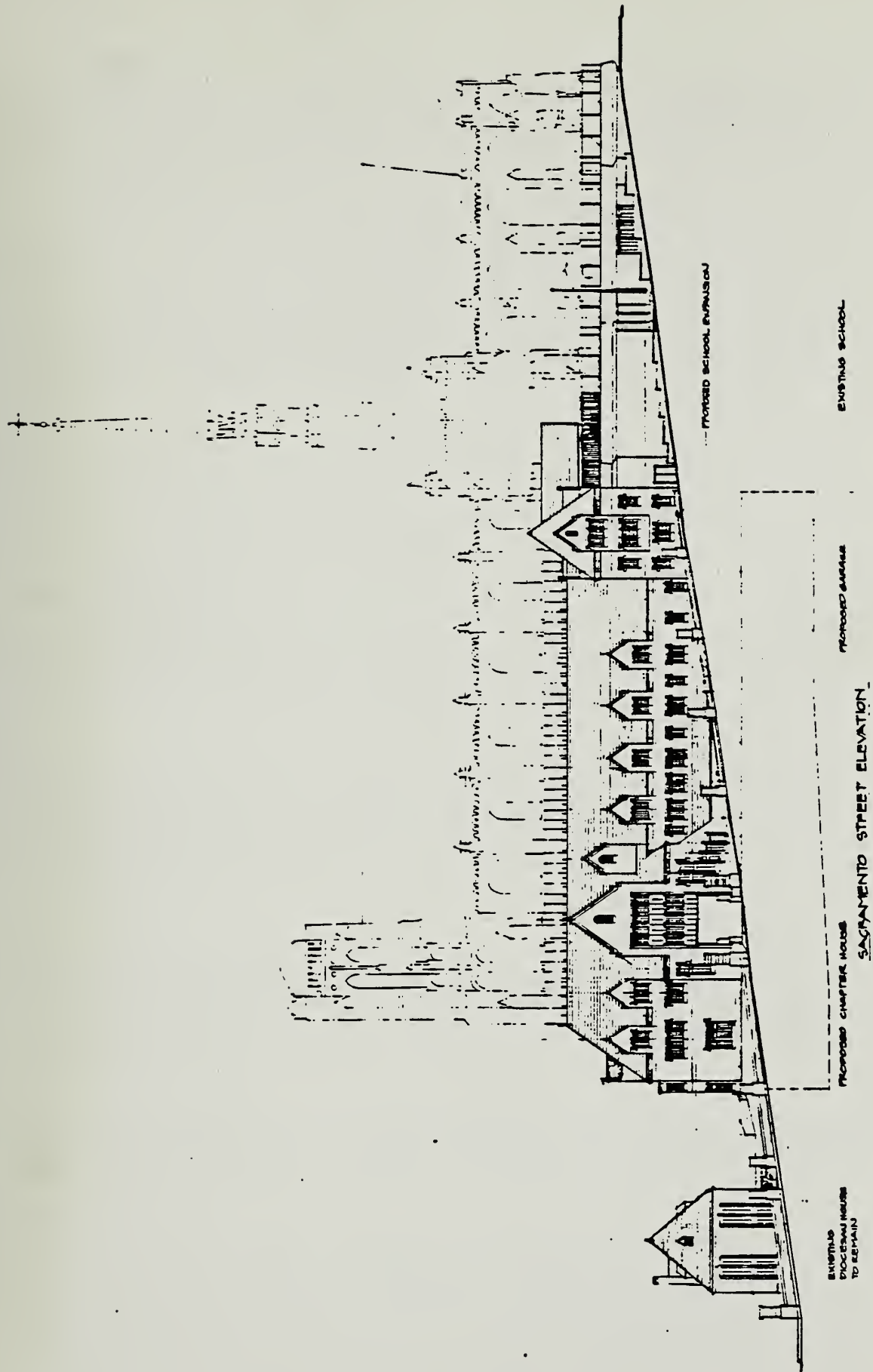
A.4 Jones Street

- PROPOSED ADDITION AND ALTERATIONS
- ..... EXISTING BUILDINGS
- - - - - EXISTING FEATURES PROPOSED FOR REMOVAL/RELOCATION

California Street

SITE PLAN SHOWING EXISTING BUILDINGS AND PROPOSED ALTERATIONS AND ADDITIONS  
(drawing by William Turnbull Associates 10/91)





SACRAMENTO STREET ELEVATION SHOWING PROPOSED CHAPTER HOUSE  
AND SCHOOL EXPANSION (drawing by William Turnbull Associates 10/91)

The proposed parking garage would be constructed on two levels underground, for a total of 45,500 sq. ft. (about 115 spaces). There would be about 50 net new spaces, as the 65 existing spaces would be eliminated. Vehicle access to the site would be relocated from Sacramento Street to Taylor Street. Primary open space would be relocated from an area west of the existing Cathedral House to an approximately 10,000 sq. ft. landscaped plaza located at grade, above the parking garage, between the proposed Chapter House and Cathedral. The total amount of useable open space would increase as a result of the project by an estimated 10,000 sq. ft.

Project construction would take approximately 16 months and is dependent on ongoing fundraising efforts. The total construction cost is estimated at \$8,000,000. The project sponsor is Grace Cathedral Corporation, affiliated with the Episcopal Diocese of California. The project architect is William Turnbull Associates of San Francisco.

## II. SUMMARY OF POTENTIAL ENVIRONMENTAL EFFECTS

### A. EFFECTS FOUND TO BE POTENTIALLY SIGNIFICANT

The Grace Cathedral Expansion project is examined in this Initial Study to identify potential effects on the environment. Some potential effects have been determined to be potentially significant, and will be analyzed in an environmental impact report (EIR). These potential effects include architectural, historic, and cultural resources; shadow; and transportation. Other issues that will be included in the EIR for informational purposes are land use and urban design.

### B. EFFECTS FOUND NOT TO BE SIGNIFICANT

The following potential effects were determined either to be insignificant or to be mitigated through measures included in the project. These items are discussed in Section III below, and require no further environmental analysis in the EIR:

#### Land Use:

While the physical configuration of structures on the site would change as a result of the project and there would be some intensification of use, there would be no change in the type of uses contained on the site.

#### Views:

Located at the summit of Nob Hill, the project would not substantially change scenic views of the Bay or of surrounding areas available to the public.

#### Glare:

The project would not use mirrored glass. Exterior lighting would be aimed or shielded to prevent glare on adjacent properties.

#### Population/Housing/Employment:

The project would result in the demolition of two dwelling units in the

Cathedral House and the construction of three dwelling units in the proposed Chapter House. The school expansion might result in the creation of two additional jobs; the underground parking structure might also require the addition of one to three new attendants/employees.

#### Noise:

After completion, building operation including project-related activities and project-related traffic would not perceptibly increase noise levels in the vicinity. Some increase in noise could be expected during construction. The project would be required to comply with the San Francisco Noise Ordinance during construction and regarding mechanical equipment noise.

#### Air Quality:

The project would not exceed the threshold established by the Bay Area Air Quality Management District (BAAQMD) which determines when projects require BAAQMD review for potential air quality impacts. Measures to mitigate potential air-quality impacts associated with excavation and construction activities are included as part of the project. (See p. 25.)

#### Utilities/Public Services:

The project would increase the demand for public utilities and services, but not in excess of amounts expected and provided for in the area.

#### Biology:

The project would require the removal or relocation of some plants and mature trees; one large Elm tree planted in 1933 would be removed. None of the plants or trees to be removed are known to be rare or endangered species. Most existing vegetation would be retained and incorporated into a landscape plan for the site.

#### Geology/Topography:

A preliminary geotechnical investigation has been completed, and detailed foundation and related structural design studies would be prepared by a California-licensed engineer prior to commencement of construction. The project sponsor and contractor would follow the recommendations of the final report regarding any excavation and construction for the project.

#### Water:

The project site is mostly covered by impervious surfaces. The project would be designed to improve existing drainage conditions on the site.

#### Energy/Natural Resources:

The project would be constructed to comply with performance standards of Title 24 of the California Code of Regulations, regarding energy conservation. The net increase in annual energy consumption as a result of the project would be approximately 1.6 billion Btu.



## Hazards:

The project would involve the demolition of a structure which might contain asbestos. The project sponsor would comply with applicable regulations regarding the removal and disposal of asbestos containing materials. These regulations and procedures, established as a part of the permit review process, would ensure that any potential impacts due to asbestos would be reduced to a level of insignificance. The Cathedral School's Emergency Response Plan would be amended to incorporate the proposed school additions. All portions of the project would comply with standards of the Building Code and the Fire Code which are intended to ensure fire safety.

### III. ENVIRONMENTAL EVALUATION CHECKLIST

#### A. COMPATIBILITY WITH EXISTING ZONING AND PLANS

Not  
Applicable Discuss

- 1) Discuss any variances, special authorizations, or changes proposed to the City Planning Code or Zoning Map, if applicable.        X
- \*2) Discuss any conflicts with any adopted environmental plans and goals of the City or Region, if applicable. X

The proposed project is within an RM-4 (Residential Mixed, High Density) Zoning District, and a 65-A Height and Bulk District, which limits the maximum allowable height to 65 feet with certain bulk restrictions above 40 feet. The project is being proposed as a Planned Unit Development (PUD) under section 304 of the City Planning Code. Consideration of a project as a PUD is permitted for sites greater than one-half acre in size. According to Section 304(a):

The procedures for Planned Unit Developments are intended for projects on sites of considerable size, developed as integrated units and designed to produce an environment of stable and desirable character which will benefit the occupants, the neighborhood, and the City as a whole. In cases of outstanding overall design, complementary to the design and values of the surrounding area, such a project may merit a well reasoned modification of certain of the provisions contained elsewhere in this Code.

Under Section 304, the project sponsor will be requesting City Planning Commission approval for modification of the standard side yard and rear yard requirements as part of the PUD. Planned Unit Developments require conditional use authorization from the City Planning Commission, including a public hearing, pursuant to Section 303 of the City Planning Code.

Because it involves a City Landmark, the proposed project, except for demolition of the Cathedral House and removal of the parking lot, would require a Certificate of Appropriateness pursuant to Section 1006.2 of the City Planning Code. Application for a Certificate of Appropriateness in cases involving construction, removal, or demolition, require approval of the City Planning Commission following review and recommendation by the Landmarks Preservation Advisory Board (LPAB). Review by the LPAB includes a public hearing.

- \* Asterisks used throughout the text indicate language derived from State EIR Guidelines, Appendix G, Normally Significant Effect.

The project would require findings by the City Planning Commission that it complies with the requirements of Section 101.1 of the City Planning Code (Proposition M).

The relationship of the proposed project to the policies of the Master Plan and provisions of the Planning Code will be discussed in the EIR. The project would not conflict with other adopted plans and goals.

## B. ENVIRONMENTAL EFFECTS

1) Land Use- Could the project:

YES    NO    DISCUSSED

\*(a) Disrupt or divide the physical arrangement of an established community?

—    X    —

\*(b) Have any substantial impact upon the existing character of the vicinity?

—    X    X

The surrounding area is characterized by a mix of land uses, including small residential buildings and large apartment complexes, ranging in height from three to twenty or more stories. Several hotels and parking garages, and the Masonic Memorial Temple Building at 1111 California, across California Street from the site, are also located in the vicinity. Public open space in the area includes Huntington Park, across Taylor Street from Grace Cathedral.

The proposed project, containing meeting spaces, offices, class rooms, and other uses related to the Cathedral's religious, educational, and service functions, would not change the land uses on the site, but would rearrange their current placement. The scale of development on the Cathedral property would continue to be dominated by the Cathedral itself. Thus, the project would not change the existing character of the neighborhood.

The project could result in some intensification of the existing land uses on the site. Most notably, the existing Cathedral School for Boys would be expanded by approximately 11,250 sq. ft., from about 17,000 sq. ft. (existing) to about 28,250 sq. ft. (proposed). The proposed expansion would add seven new classrooms and some additional library space, as well as additional storage space and an administrative office. The new classrooms would accommodate existing activities which are currently held in the basement of the Cathedral and might allow an increase in the number of students attending the Cathedral School. In recent years, the schools enrollment has ranged from 185 to 210 students with a staff of approximately 30. The school expansion would result in a maximum increase of about 30 students in grades five through eight and two staff members. No change is anticipated in the number of students in grades K through four, or in the number participating in the school's day care program./2/

In addition to the new square footage associated with the school expansion, the proposed Chapter House and the area under the proposed staircase would contain approximately 2,500 net new sq. ft. (about 23,910 sq. ft. minus the 21,325 sq. ft. in the existing Cathedral House and under-stair spaces). Parking facilities on the site would be expanded to accommodate about 115 spaces, about 50 more spaces than currently (65)..

According to the project sponsor, the existing Cathedral House currently includes six meeting spaces used for public gatherings, with a total occupancy of



approximately 140 individuals, although not all spaces are necessarily occupied at one time. The Cathedral and its constituency also make use of classroom space and spaces in the Cathedral Crypt level (under the existing staircase) which accommodate a total of approximately 470 individuals.

The proposed project would eliminate all meeting space in the Cathedral House and one meeting space on the Crypt level of the Cathedral with occupancy for 40 individuals. The proposed Chapter House would include seven spaces which could be used for public gatherings accommodating up to approximately 390 individuals. The Cathedral Crypt level would also include three new meeting spaces under the proposed staircase, and would accommodate approximately 280. Thus, the net new meeting spaces created by the project would be three (one in the Cathedral House and two under the staircase) and the total net new capacity would be approximately 500 persons./3/

In addition to the daily and weekly meetings which typically utilize the existing meeting spaces on the Cathedral property as noted, up to 24 annual events currently take place in the Cathedral itself, the space between the Cathedral and the Cathedral House, in the largest Crypt level meeting space, and in the parking lot. In one recent instance, an annual event drew over 2,000 people to the site. The landscaped courtyard proposed for above the parking structure would replace the surface parking lot and be used for some of these special events.

According to the project sponsor, the new meeting spaces proposed would initially be used by the congregation of Grace Cathedral and members of the community on the same daily and weekly basis that current spaces are utilized. The size of groups using the facilities would not immediately change. (Meeting spaces would continue to be used by community groups such as Alcoholics Anonymous and Nob Hill Neighbors.) Events, including baptisms, weddings, funerals, and receptions, would also continue to be accommodated with the same frequency. Chapter House functions would be more accessible than current activities, due to the provision of handicapped parking and elevator access to all floors of the proposed building. The Cathedral building itself would remain the principal venue on the site, and there would be no change in the size or frequency of events which draw the largest attendance to the site (i.e. holiday services and annual events)/4/

At some time in the future, there might be an increase in demand for meeting space, which the proposed meeting rooms in the Chapter House and the Crypt level would help to accommodate. Any resulting increase in the frequency and size of meetings at the site might contribute incrementally to an increase in population and traffic congestion in the vicinity of the Cathedral. The increase in population and congestion related to the current project proposal (i.e. intensification of the current land use) would ultimately be limited by the increase in capacity described above, that is, a total maximum capacity increase of about 500 persons dispersed among the various meeting areas and meeting times.

The environmental analysis of the project does not assume any substantial intensification of use, for the following two reasons. First, the increase in total capacity would not, by itself, increase use of the site. Second, although some future demand for meeting space might be accommodated, data on existing use of the Cathedral facilities indicates that all meeting spaces are not used to capacity now (i.e. not at their total, combined capacity), and it can be assumed that any future demand would be also be distributed among various meeting spaces which would not be fully occupied all at the same time.



Although the potential effects of the project on land use in the area require no further analysis in the EIR, some additional discussion will be included there for informational purposes.

2) <u>Visual Quality</u> - Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
*(a) Have a substantial, demonstrable negative aesthetic effect?	—	<u>X</u>	<u>X</u>
(b) Substantially degrade or obstruct any scenic view or vista now observed from public areas?	—	<u>X</u>	<u>X</u>
(c) Generate obtrusive light or glare substantially impacting other properties?	—	<u>X</u>	<u>X</u>

Urban design aspects of the proposed project will be discussed in the EIR for informational purposes.

The primary scenic views currently available to the public in the vicinity of the project site correspond to the public rights-of-way which allow vistas of the City and the Bay in several directions. The heights of surrounding buildings limit views outside of these rights-of-way. The proposed project would remain within the existing boundaries of the site and would not intrude on any public right-of-way. Existing public vistas from Huntington Park, except those of the Cathedral itself, would not be affected by the project.

Some views of the Cathedral property would change, as would some views across the Cathedral property. Specifically, views of the Cathedral facade from Huntington Park would expand following demolition of the Cathedral House and construction of the proposed stairs. In addition, private views from the buildings which currently face Grace Cathedral across Sacramento Street would be partially obstructed by the proposed Chapter House and school expansion. (See Figure 3, p. 4.) While the project would obstruct some private views, it would not block scenic views now available to the public. Views require no further analysis and will not be discussed in the EIR.

The project would comply with City Planning Commission Resolution 9212 which prohibits the use of mirrored or reflective glass. Any exterior lighting associated with the project would be shielded to limit glare on adjacent properties. Glare requires no further analysis and will not be discussed in the EIR.

3) <u>Population</u> - Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
*(a) Induce substantial growth or concentration of population?	—	<u>X</u>	<u>X</u>
*(b) Displace a large number of people (involving either housing or employment)?	—	<u>X</u>	<u>X</u>
(c) Create a substantial demand for additional housing in San Francisco, or substantially reduce the housing supply?	—	<u>X</u>	—

The Cathedral and other existing buildings on the site currently accommodate events which range in size from under 10 for the regularly scheduled morning Holy Eucharist, to over 2,000 for one-time special events such as the Dalai Lama address in April of 1991.

The proposed project would result in the demolition of two dwelling units in the Cathedral House and the construction of three dwelling units in the proposed Chapter House. According to the project sponsor, the residential units would not be rented, but would be occupied by guests of the Cathedral and retired Cathedral employees, as are the units to be demolished.

The project would most likely result in the addition of about two teachers to the staff of the Cathedral School, and might also require one to three new staff members to supervise the proposed parking structure. There would be no other change in employment levels as a result of the project.

The project would most likely also result in an increase in the number of students attending the Cathedral School (from approximately 210 to 240 -- an increase of about 30), and could accommodate some future increase in demand for meeting space, potentially resulting in an increase in the number and size of programs on the site. Three (net) new meeting spaces would be created by the project and would result in an increase in capacity of approximately 500 additional individuals. Since concurrent use of all meeting spaces at their maximum capacity would be highly unusual, this analysis of project impacts does not assume any substantial intensification of use despite the increased capacity. (See land use discussion above.) Population will be discussed in the EIR only as it relates to potential transportation impacts.

4) <u>Transportation/Circulation</u> - Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSE</u>
*(a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system?	—	<u>X</u>	<u>X</u>
(b) Interfere with existing transportation systems, causing substantial alterations to circulation patterns or major traffic hazards?	—	<u>X</u>	<u>X</u>
(c) Cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity?	—	<u>X</u>	<u>X</u>
(d) Cause a substantial increase in parking demand which cannot be accommodated by existing parking facilities?	—	<u>X</u>	<u>X</u>

The proposed project would eliminate 65 existing off-street parking spaces and provide about 115 spaces, for an increase of about 50 spaces. Vehicular access to the site would be relocated from a one-lane driveway on Sacramento Street, which is a single-lane transit and residential street, one-way westbound, to Taylor Street, which is a two-way street running north-south. The new access would include both an entry and exit lane. The project could cause an increase in traffic and parking demand. The EIR will discuss potential effects of the project related to traffic and parking. Construction traffic impacts will also be discussed in the EIR.

5) <u>Noise</u> - Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSS</u>
*(a) Increase substantially the ambient noise levels for adjoining areas?	—	<u>X</u>	<u>X</u>
(b) Violate Title 24 Noise Insulation Standards, if applicable?	—	<u>X</u>	<u>X</u>
(c) Be substantially impacted by existing noise levels?	—	<u>X</u>	<u>X</u>



Project construction would temporarily increase noise levels in the vicinity of the site for a period of approximately 16 months. Construction noise levels would vary, depending on the construction phase, equipment used, the distance between the noise source and listener, and any barriers between the noise source and listener. Project construction would occur in several stages: demolition,

excavation and foundation preparation, framing, and finishing. Throughout the construction period there would be truck traffic to and from the site, hauling away debris and excavated materials, or delivering building materials. According to a preliminary geotechnical report, heavy ripping equipment would be necessary during excavation in a few areas of the site if fresh gray sandstone were encountered. In other areas, conventional equipment would be sufficient./5/ Construction of the parking structure would require excavation to a depth of 30 feet (approximately 24,500 cubic yards of material would be removed). The proposed buildings would be supported on spread footings founded at shallow depth; pile driving would not be required. The average noise level of construction activities other than pile driving has been measured at between 78 and 89 dBA./6/

The project would be required to comply with the San Francisco Noise Ordinance, San Francisco Police Code Article 2900, which regulates noise. The ordinance requires that noise created by construction equipment other than impact tools not exceed 80 dBA at a distance of 100 ft. from the source. Impact tools (e.g. jack hammers) must have both intake and exhaust muffled to the satisfaction of the Department of Public Works. Section 2907 of the Ordinance limits equipment noise levels at the property line unless a special permit is authorized by the Director of Public Works. These required measures would limit temporary noise impacts associated with construction activities.

The noise environment of the site, like much of San Francisco, is dominated by vehicular traffic noise. The proposed project would not change land uses on the project site, and would not introduce or intensify receptors sensitive to traffic noise.

Title 24 of the California Government Code of Regulations establishes uniform noise insulation standards for residential projects. Title 24 Noise Standards would be applicable to the three dwelling units which are proposed as part of the Chapter House. The Bureau of Building Inspection would review the final building plans to insure that the building wall and floor/ceiling assemblies for the units meet State standards regarding sound transmission.

Project-related activities and operation of the proposed Cathedral facilities would not result in perceptibly greater noise levels than those existing in the vicinity. To produce a noticeable increase in environmental noise, a doubling of existing traffic volume would be required. A traffic increase of this magnitude would not occur as a result of the proposed project.

As described above, the project would be required to comply with the San Francisco Noise Ordinance, San Francisco Police Code Article 2900, which regulates mechanical equipment noise. The project site and surrounding area are within a RM-4 (Residential Mixed, High Density) Zoning District. In this district, the ordinance limits equipment noise levels at the property line to 60 dBA between 7 a.m. and 10 p.m. and 55 dBA between the hours of 10 p.m. and 7 a.m. During lulls in traffic, mechanical equipment associated with operation of



the proposed facilities and generating 60 dBA could dominate the noise environment at the site. The project engineer and architect would include design features in the proposed buildings to limit mechanical equipment noise levels to 55 dBA. Equipment noise levels would not be perceptible above the ambient noise levels in the area. Noise will not be discussed in the EIR.

6) Air Quality/Climate - Could the project:

YES    NO    DISCUSSED

- \* (a) Violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation?    —    X    X
- \* (b) Expose sensitive receptors to substantial pollutant concentrations?    —    X    —
- (c) Permeate its vicinity with objectionable odors?    —    X    —
- (d) Alter wind, moisture or temperature (including sun shading effects) so as to substantially affect public areas, or change the climate either in the community or region?    —    X    X

The Bay Area Air Quality Management District (BAAQMD) has established thresholds for projects requiring its review for potential air quality impacts. These thresholds are based on the minimum size projects which the District considers capable of producing air quality problems. The project would not exceed this minimum standard. Therefore, no significant air quality impacts would be generated by the proposal.

Construction activities would temporarily affect local air quality in the vicinity. Demolition, excavation, grading, and other construction activities would temporarily affect local air quality for about 16 months, causing a temporary increase in particulate dust and other pollutants. Dust emission during demolition and excavation would increase particulate concentrations near the site. Dustfall can be expected at times on surfaces within 200 to 800 feet. Under high winds exceeding 12 miles per hour, localized effects including human discomfort might occur downwind from blowing dust. Construction dust is composed primarily of large particles that settle out of the atmosphere more rapidly with increasing distance from the source. More of a nuisance than a hazard for most people, this dust could affect persons with respiratory diseases, as well as sensitive electronics or communication equipment. The project sponsor would require the contractor to wet down the construction site twice a day during construction to reduce particulates by at least 50 percent, would require covering soil, and, and other material, and would require street sweeping around demolition and construction sites at least once per day. (See mitigation measure, p. 25.)

Diesel-powered equipment would emit, in decreasing order by weight, nitrogen oxides, carbon monoxide, sulfur oxides, hydrocarbons, and particulates. This would increase local concentrations temporarily but would not be expected to increase the frequency of violations of air quality standards. The project sponsor would require the project contractor to maintain and operate construction equipment in such a way as to minimize exhaust emissions. (See mitigation measure, p. 25.)

Temporary construction-related and project-related air quality effects require further analysis and will not be discussed in the EIR.

The City Planning Code Section 148, Reduction of Ground-Level Wind Currents in C-3 (Downtown Commercial) Districts, requires buildings to be shaped so as not to cause ground-level wind currents to exceed, more than 10 percent of the time, 11 mph in substantial pedestrian use areas, and 7 mph in public seating areas. Similarly, the City Planning Code requires that buildings not cause equivalent wind speeds to reach or exceed the hazard level of 26 mph for a single full hour of the year, or 0.01% of the time. The wind ordinance is defined in terms of equivalent wind speed, an average wind speed (mean velocity) adjusted to include the level of gustiness and turbulence./7/ The project site is located in an RM-4 (Residential Mixed, High Density) District in which the City Planning Code wind requirements do not apply. For the purposes of this analysis, however, the project is examined in relation to the 7 mph and 11 mph comfort criteria and the 26 mph hazard criterion.

U.S. Weather Bureau data shows that westerly to northwesterly winds are the most frequent and strongest winds during all seasons in San Francisco. Based on past wind-tunnel test data for a project at 1300 Sacramento Street interpreted to reflect current methodology, as well as a visit to the site, existing winds in the project vicinity currently exceed the 11 mph pedestrian comfort criterion along Jones Street from Clay to California Streets, along Sacramento Street between Leavenworth and Taylor Streets, and on California Street midway between Jones and Taylor Streets. The 26 mph hazard criterion is exceeded at locations along Jones Street. Extrapolation of the available data suggests that, although exceedences of the pedestrian comfort criterion may exist, the hazard criterion is not exceeded on the Taylor Street frontage./8/

While new multi-story development, particularly high-rise development, in the project vicinity would have the potential to create adverse winds or aggravate existing conditions, it is not anticipated that structures of the scale of the proposed project would have much effect on the local wind environment. On a very local level (i.e., within the Grace Cathedral block), increases and decreases of several miles per hour could occur as a result of the proposed project. However, in the case where a hazard exceedence already occurs in the existing setting, the addition of the project would not be expected to either contribute to, or reduce measurably, that exceedence. With the demolition of the existing Cathedral House and the removal of trees located at the northeast corner of the Cathedral, it is likely that winds in the area of the (existing and proposed) Cathedral steps would increase. However, the construction of the proposed Chapter House and the introduction of new landscaping would provide some protection from the predominant winds. It is not anticipated that project-related wind effects on the steps would result in changes of more than a few miles per hour. Further, with the expansion of the Cathedral School, additional protection from the predominant winds would be provided.

In summary, except for the increases and decreases in local wind speeds described above, it would not be expected that the project, with or without the Cathedral School Expansion, would have a substantial effect on the existing wind environment in the area. Further, due to the relatively small scale of the proposed buildings, it is unlikely that these structures could be designed to measurably improve existing ambient wind conditions or to mitigate the occurrence of any hazardous winds. The project sponsor has agreed to take existing windy conditions in the project area into account when developing the final design of on-site pedestrian areas. In the immediate vicinity of those areas modified by the proposed project, landscaping or screening would be incorporated wherever



feasible, to provide pedestrians using the project site with protection from winds blowing from the west to northwest. Potential wind effects of the project require no further analysis and will not be discussed in the EIR.

The City's sunlight ordinance (City Planning Code Section 295) was adopted in response to Proposition K (passed, November 1984) in order to protect from new shadow open spaces under the jurisdiction of (or designated to be acquired by) the Department of Recreation and Park. Section 295 protects these spaces from shadowing from one hour after sunrise to one hour before sunset, year round.

Because the proposed development would not exceed 40 feet in height, the project is not subject to the requirements of Section 295. The project would, however, change to some extent the location and duration of shading currently observed in Huntington Park and on streets and sidewalks in the vicinity. Potential shadow impacts will be discussed in the EIR.

7) <u>Utilities/Public Services</u> - Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
*(a) Breach published national, state or local standards relating to solid waste or litter control?	___	<u>X</u>	___
*(b) Extend a sewer trunk line with capacity to serve new development?	___	<u>X</u>	___
(c) Substantially increase demand for schools, recreation or other public facilities?	___	<u>X</u>	___
(d) Require major expansion of power, water, or communications facilities?	___	<u>X</u>	<u>X</u>

The project could increase demand for and use of public services and utilities on the project site and increase water and energy consumption, but not in excess of amounts expected and provided for in the area. The proposed project's potential effect on utilities and other public services requires no further analysis and will not be discussed in the EIR.

8) <u>Biology</u> - Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
*(a) Substantially affect a rare or endangered species of animal or plant or the habitat of the species?	___	<u>X</u>	<u>X</u>
*(b) Substantially diminish habitat for fish, wildlife or plants, or interfere substantially with the movement of any resident or migratory fish or wildlife species?	___	<u>X</u>	___
(c) Require removal of substantial numbers of mature, scenic trees?	___	<u>X</u>	<u>X</u>

About 10 to 15 mature trees and an assortment of other plant materials on the site would be removed or relocated to make way for the proposed project. Plants and trees to be removed include the following:

- a large American Elm, planted in 1933 and located at the northeast corner of the Cathedral building;
- three sycamore trees at the periphery of the site on California and Taylor Streets;
- seven pine trees and ground cover from the site of the proposed school expansion;



- junipers, olives, pines, cedars, and other small plants from around the Diocesan House;
- ivy and other small plants from the periphery of the existing parking lot.

The two palm trees at the north edge of the site would be relocated and retained. Most of the existing trees and other plant materials on the project site would be retained in their current location and would be incorporated into a landscape plan for the site; the plan would add approximately 20 to 30 new trees, of various sizes to the site, along with assorted small plants. There is no evidence that any rare or endangered variety of trees/plants would be affected by the proposed project./9/ There is also no evidence of rare or endangered animal habitat on the site.

These matters require no further analysis and will not be discussed in the EIR.

9) <u>Geology/Topography</u> - Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
*(a) Expose people or structures to major geologic hazards (slides, subsidence, erosion and liquefaction).	___	<u>X</u>	<u>X</u>
(b) Change substantially the topography or any unique geologic or physical features of the site?	___	<u>X</u>	<u>X</u>

The project site is at the top of Nob Hill, at an elevation of between 278 and 338 feet above San Francisco Datum (SFD)./10/ The site slopes down to the east, and is partially underlain by zero to ten feet of loosely placed fill of construction debris and clayey sand. Below the fill, and in areas where there is no fill, there is approximately three feet of residual soil and then layers of shale and graywacke sandstone of the Franciscan Formation with clayey seams throughout./11/ During the preliminary investigation, seepage zones were found below seven feet in one boring location and below 20 feet in another; these seepage zones were attributed to perched water and not to the groundwater table./12/

Excavation for the project foundation and underground parking structure would be conducted to about 30 feet below the existing ground surface. About 24,500 cubic yards of material would be excavated./13/

According to the preliminary report, the proposed structures would be supported on foundations of spread footings and end-bearing piers founded on rock. The spread footings would be founded on rock at least 10 feet below existing grade and at or below the elevation of existing foundations. End-bearing drilled piers could be used in areas where subsurface conditions (fill thickness or residual soil) would make excavation for spread footings too costly. Basement walls would be designed to resist soil and rock pressures; drainage would be provided near basement walls and beneath the floor slab. Side wall shoring and possibly some underpinning of existing foundations would be required during excavation./14/

Detailed foundation and related structural design studies would be prepared for the project by a California-licensed structural engineer and reviewed by a geotechnical engineer. These final, more detailed investigations would determine actual design parameters and construction methods to be followed. The building contractor must comply with the San Francisco Building Code and the Excavation Standards of the California Occupational Safety and Health Agency.

The closest active faults to San Francisco are the San Andreas Fault, about 8-11 miles west of the site, and the Hayward Fault, about 11 miles east of the site. The site is not located in a special geologic study area as mapped by the City. The project area would experience strong ground-shaking in a major earthquake (Intensity Level D; general but not universal fall of brick chimneys, cracks in masonry and brickwork)./15/ According to the preliminary geotechnical report, loose fill materials on the site would not be susceptible to liquefaction during a major earthquake, but might densify, resulting in some settlement of paved areas surrounding the proposed structures./16/

The project sponsor would follow the recommendations of final foundation and structural reports regarding any excavation and construction on the site. The new structures would include earthquake-resistant design and materials and would meet current seismic engineering standards of the San Francisco Building Code. The project would replace a building on the site built prior to current seismic code standards. In general, buildings built prior to current seismic code standards would be more susceptible to earthquake damage than the proposed structures. These issues require no further analysis and will not be discussed in the EIR.

10) <u>Water</u> - Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSS</u>
*(a) Substantially degrade water quality, or contaminate a public water supply?	—	<u>X</u>	—
*(b) Substantially degrade or deplete ground water resources, or interfere substantially with ground water recharge?	—	<u>X</u>	—
*(c) Cause substantial flooding, erosion or siltation?	—	<u>X</u>	<u>X</u>

The project site is largely covered by impervious surfaces. The proposed project would not change this site characteristic, but would cover portions of the site with buildings and landscaped open area above an underground parking structure. Drainage patterns would change, and could be improved as a result of the project. Site runoff would continue to drain into the City's combined sanitary and storm drainage system. This topic requires no further analysis and will not be included in the EIR.

11) <u>Energy/Natural Resources</u> - Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSS</u>
*(a) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	—	<u>X</u>	<u>X</u>
(b) Have a substantial effect on the potential use, extraction, or depletion of a natural resource?	—	<u>X</u>	<u>X</u>

Annual energy consumption by existing uses on the site is approximately 468,000 kWh of electricity and 9,374 therms of natural gas, equal to approximately 5.8 billion Btu at the source./17/

Removal of existing structures would require an unknown amount of energy. Fabrication and transportation of building materials, worker transportation, site development, and building construction would require about 42 billion Btu of gasoline, diesel fuel, natural gas, and electricity, equivalent to 7,500 barrel of oil./18/ Distributed over an estimated 50-year life of the project, this



would be about .84 billion Btu per year, or about 34 percent of the total net new annual energy requirements.

New buildings in San Francisco are required to conform to energy conservation standards specified by Title 24 of the California Code of Regulations. Documentation showing compliance with these standards is submitted with the application for the building permit and is enforced by the Bureau of Building Inspection.

Table 1, on page 19, shows the estimated (net new) operational energy that would be used by the project. Project demand for electricity during PG&E's peak electrical load periods, July and August afternoons, would be about 43 kW, a negligible fraction of PG&E's peak load of 17,600 MW./19/ Project demand for natural gas during PG&E's peak natural gas load periods, January Mornings, would be about 2,000 cubic feet per day (2.2 million Btu), or about .000058 percent of PG&E's peak sendout of about 3.4 billion cubic feet per day./20/ Annual and peak daily electricity and natural gas consumption are shown in Figures 4 and 5, pages 20 and 21.

Increased San Francisco energy demands to the year 2000 would be met by PG&E from nuclear sources, oil and gas facilities, hydroelectric and geothermal facilities, and other sources such as cogeneration, wind, and imports. PG&E plans to continue receiving most of its natural gas from Canada and Texas under long-term contracts.

Energy impacts require no further analysis and will not be discussed in the EIR.

12) <u>Hazards</u> - Could the project:	<u>YES</u>	<u>NO</u>	<u>DISCUSSED</u>
*(a) Create a potential public health hazard or involve the use, production or disposal of materials which pose a hazard to people or animal or plant populations in the area affected?	___	<u>X</u>	<u>X</u>
*(b) Interfere with emergency response plans or emergency evacuation plans?	___	<u>X</u>	<u>X</u>
(c) Create a potentially substantial fire hazard?	___	<u>X</u>	<u>X</u>

Asbestos-containing materials may be found within the Cathedral House, which is proposed to be demolished as part of the project. Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, requires that local agencies not issue demolition permits until an applicant has demonstrated compliance with notification requirements under applicable Federal regulations regarding hazardous air pollutants, including asbestos. The Bay Area Air Quality Management District (BAAQMD) is delegated by the Environmental Protection Agency to enforce Federal regulations related to airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified ten days in advance of any proposed demolition. Notification includes the names and addresses of operations and persons responsible, including the contractor; description and location of the structure to be demolished including size, age and prior use, and the approximate amount of friable (easily crumbled or pulverized) asbestos; scheduled starting and completion dates of demolition; nature of planned demolition and methods to be employed; procedures to be employed to meet BAAQMD requirements; and the name and location of the waste disposal site to be used. The District randomly inspects asbestos removal



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TABLE 1: ESTIMATED PROJECT ENERGY USE/a/

Daily Natural Gas Consumption/b/

Estimated natural gas consumption per sq. ft.	89 Btu/c/
Estimated peak daily natural gas consumption	20 therms (2.2 million Btu)/c

Monthly Electric Consumption/b/

Estimated electrical consumption per sq. ft.	1.10 kWh (11,300 Btu)/d/
Estimated electrical consumption	10,000 kWh (103 million Btu)

Annual Consumption

Estimated annual natural gas consumption	3,709 therms (410 million Btu)
Estimated annual electrical consumption	120,000 kWh (1.2 billion Btu)
Connected kilowatt load	49 Kilowatts
Estimated total annual energy consumption	1.6 billion Btu (276 barrels of oil)

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/a/ Energy use includes space conditioning, service water heating and lighting. Estimates were based on existing energy use (PG&E bills from 11/90 to 10/91) and adjusted proportionately based on the combined net new square footage proposed in the Chapter House and under-stair spaces. The project would have to comply with the more stringent energy conservation requirements of Title 24; therefore these estimates are most likely high. Note: monthly and annual figures may not match due to rounding-off.

/b/ These calculations were completed by Jeff Wehling of Environmental Science Associates, Inc., and are available for review in the project case file at the Department of City Planning, 450 McAllister Street, San Francisco.

/c/ Btu (British thermal unit): a standard unit for measuring heat. Technically, a Btu is the quantity of heat required to raise the temperature of one pound of water one degree Fahrenheit (251.97 calories) at sea level.

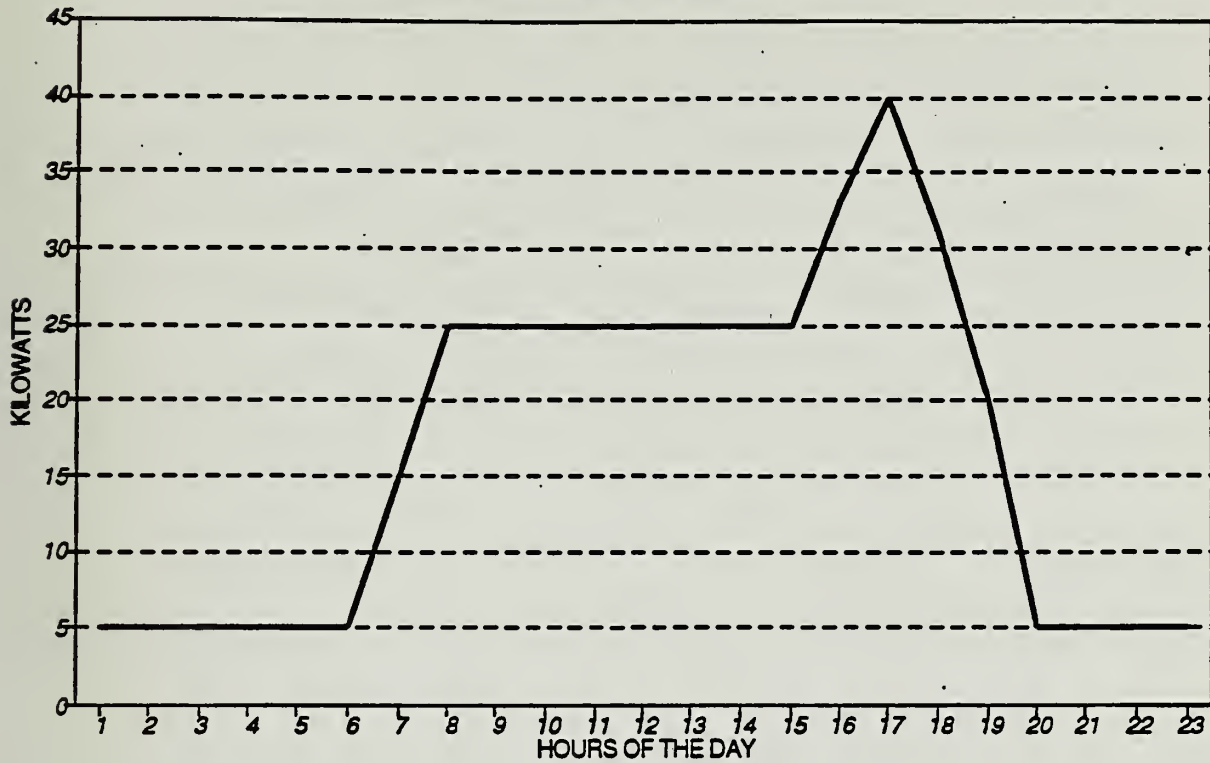
/d/ Energy conversion factors:

one gallon gasoline	=	140,000 Btu
one kilowatt hour(kwh)	=	10,239 Btu
one therm	=	110,000 Btu
one barrel of oil	=	5,800,000 Btu

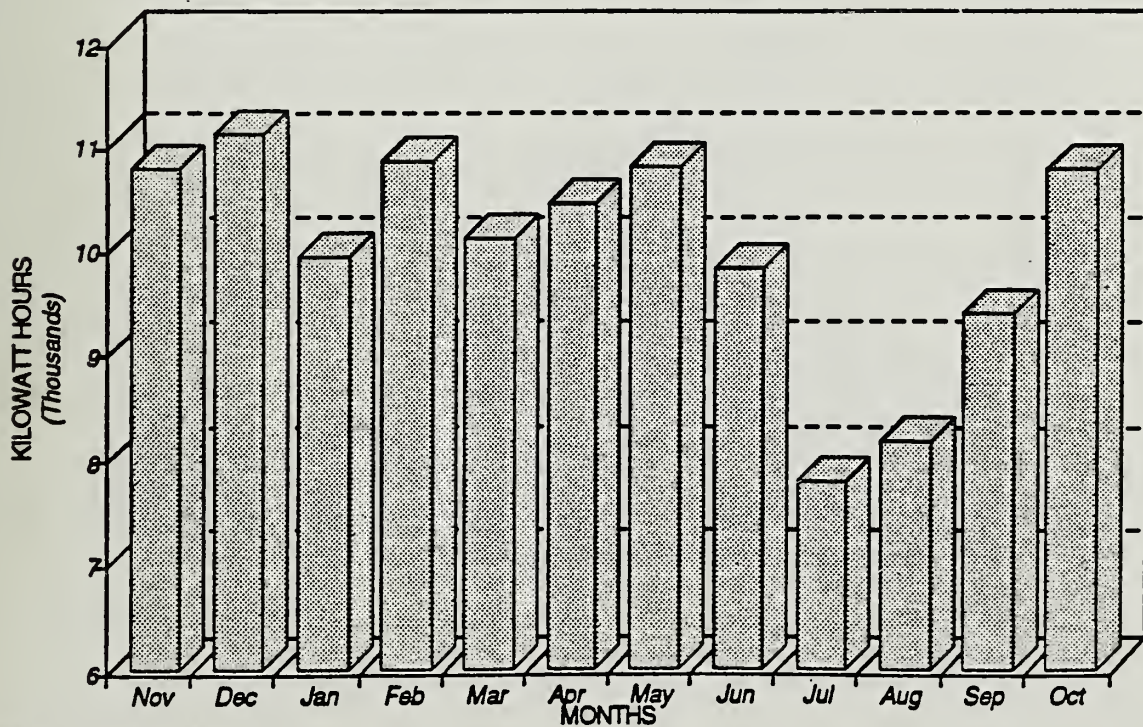
(based on information supplied by Environmental Science Associates, Inc.)

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**ESTIMATED PEAK DAILY ELECTRICITY CONSUMPTION  
GRACE CATHEDRAL EXPANSION**

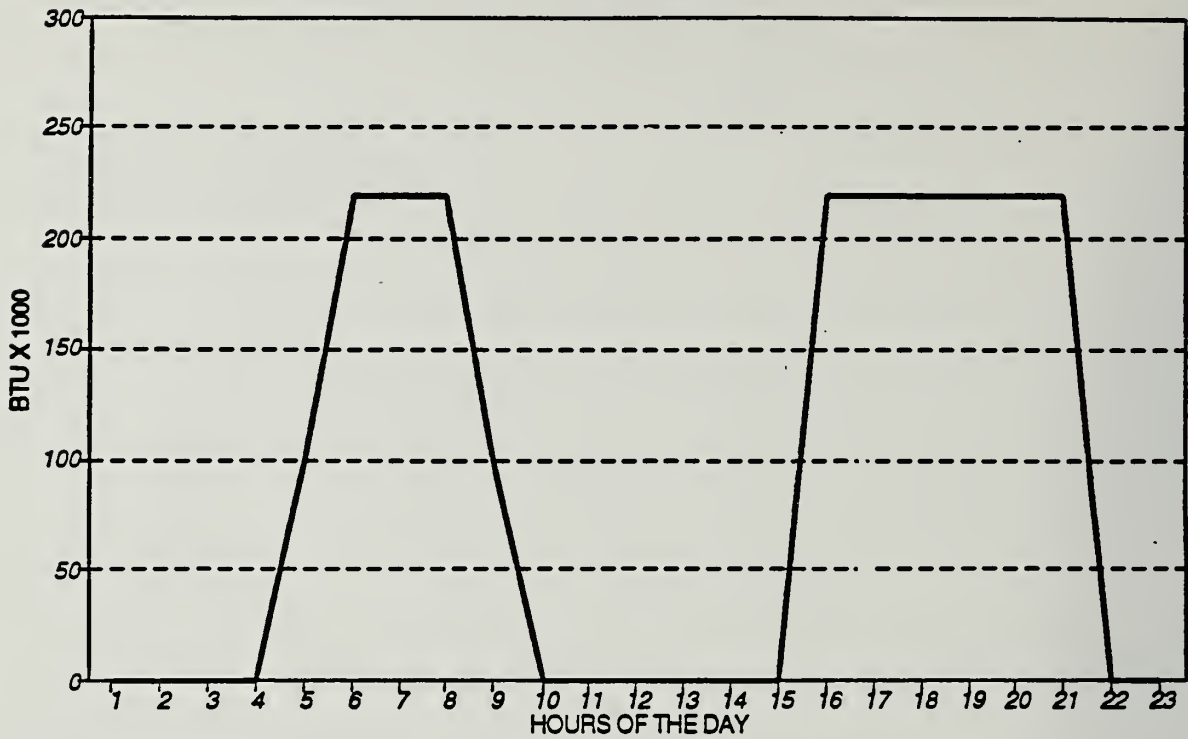


**ESTIMATED ANNUAL ELECTRICITY CONSUMPTION  
GRACE CATHEDRAL EXPANSION**

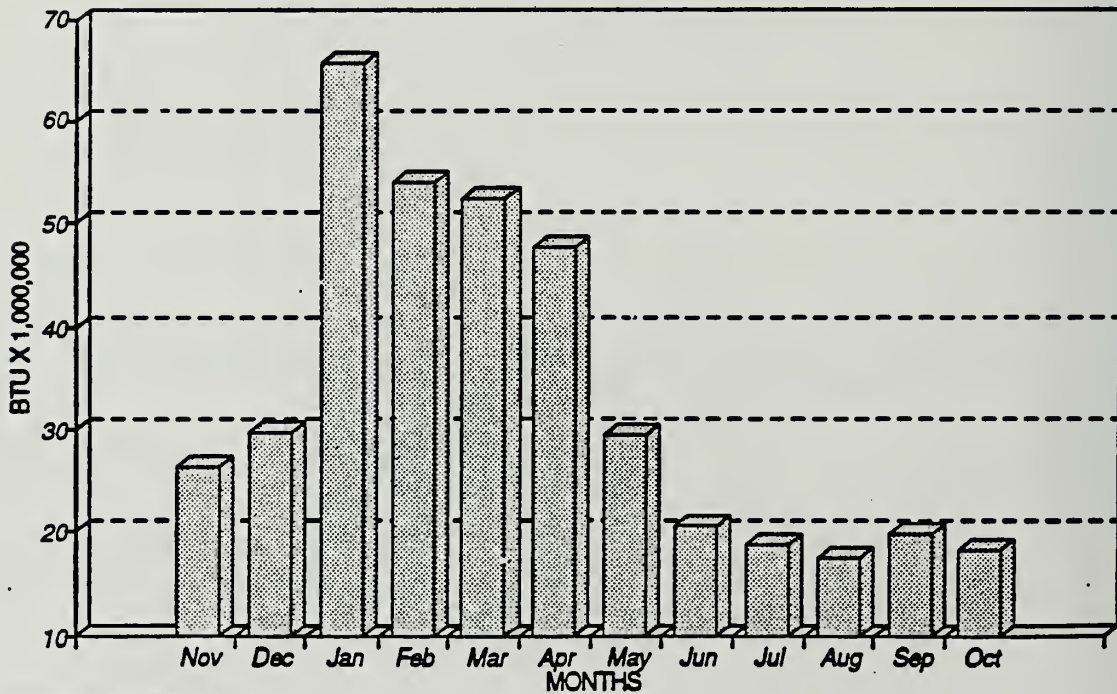


Data provided by ESA, INC.

**ESTIMATED PEAK DAILY NATURAL GAS CONSUMPTION  
GRACE CATHEDRAL EXPANSION**



**ESTIMATED ANNUAL NATURAL GAS CONSUMPTION  
GRACE CATHEDRAL EXPANSION**



Data provided by ESA, INC.



operations. In addition, the District will inspect any removal operation concerning which a complaint has been received.

The local office of the State Occupational Safety and Health Administration (OSHA) must be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in 29 CFR 1926.58 where there is asbestos-related work involving 100 square feet or more of asbestos containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where demolition is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material is required to file a Hazardous Waste Manifest which details the hauling of the material from the site and the disposal of it. The project sponsor would have the contractor conform to State regulations for the removal of toxic materials in the existing structures. Pursuant to California law, the Bureau of Building Inspection (BBI) would not issue the required demolition permit until the applicant has complied with the notice requirements described above. The sponsor would also follow the above procedures regarding the demolition of any portion of the school required to accommodate the proposed additions. These regulations and procedures, already established as a part of the permit review process, would insure that any potential impacts due to asbestos would be reduced to a level of insignificance.

San Francisco ensures fire safety primarily through provisions of the Building Code and the Fire Code. The project would conform to these provisions which require, among other things, development of both an exit drill plan and an emergency procedure manual for educational occupancies. The Cathedral School's existing plan would be amended to incorporate the school additions following their completion.

Hazards and fire safety require no further analysis and will not be discussed in the EIR.

13) Cultural - Could the project:

YES    NO    DISCUSSED

- \*(a) Disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group; or a paleontological site except as a part of a scientific study?
- (b) Conflict with established recreational, educational, religious or scientific uses of the area?
- (c) Conflict with the preservation of buildings subject to the provisions of Article 10 or Article 11 of the City Planning Code?

<u>X</u>	<u>      </u>	<u>X</u>
<u>      </u>	<u>X</u>	<u>      </u>
<u>X</u>	<u>      </u>	<u>X</u>

The proposed parking structure, which would also support foundations of the school additions and Chapter House, would require excavation to a depth of about 30 feet. Archival research will be conducted regarding the possibility for recovering artifacts of potential significance; the results of that research will be included in the EIR.

The proposed project would require the removal and relocation of portions of the Crocker Fence and demolition of the Cathedral House, as well as other changes

within the boundaries of the Cathedral Close. The Cathedral Close, including the Cathedral, Cathedral School, Diocesan House, and Crocker Fence, and excluding the Cathedral House and existing parking lot, is designated City Landmark No. 170 and is subject to the provisions of Article 10 of the Planning Code. While not part of the designated Landmark, the Cathedral House was rated "3" in the 1976 Department of City Planning Architectural Survey. Work proposed within the boundaries of the Cathedral Close (except demolition of the Cathedral House and removal of the existing parking lot), and in particular the removal/relocation of portions of the Crocker Fence, would require a Certificate of Appropriateness for proposed construction, alteration, removal, or demolition of a structure on a Landmark site.

In summary, the EIR will discuss the project's potential impacts on cultural resources, including archaeology, demolition of the Cathedral House, and propose removal and relocation of parts of the Crocker Fence.

#### NOTES

- /1/ The precise location, boundaries, and features/characteristics of the Cathedral Close are described in City Planning Case File No. 83.560L. In general, a "close" is defined as "an enclosed space around or at the side of a building; especially the neighborhood of a cathedral." (Cyrill Harris, ed., Illustrated Dictionary of Historic Architecture, Dover Publications, New York, 1983, p. 122. Originally published in 1977 by McGraw-Hill Book Company as Historic Architectural Sourcebook.)
- /2/ Rev. Malcom H. Manson, Canon Headmaster of the Cathedral School for Boys, letter, September 25, 1991.
- /3/ These occupancy estimates have been rounded-off and are derived from data provided by Sarah M. Rockwell, letter, November 5, 1991.
- /4/ Rev. Canon Marc DuPlan Lee, Chancellor, Grace Cathedral, in a phone conversation on August 14, 1991, as well as subsequent information provided by Sarah M. Rockwell, letter, November 5, 1991.
- /5/ Dames & Moore, Foundation Investigation, Proposed Addition to Grace Cathedral, California and Taylor Streets, San Francisco, California, p.6. A copy of this report is available for review in the project's case file at the Department of City Planning, 450 McAllister Street.
- /6/ Bolt, Beranek and Newman, December 13, 1971, Noise from Construction Equipment and Home Appliances, Environmental Protection Agency.)
- /7/ Equivalent mean wind speed incorporates the effects of gustiness or turbulence on pedestrians and is defined as the mean wind multiplied by the quantity (one plus three times the turbulence intensity) divided by 1.45.
- /8/ An evaluation of potential wind effects was completed by Environmental Science Associates, Inc. (Judy Kavanaugh and Chuck Bennett letter, October 18, 1991). Sections of the preceding two paragraphs, and the paragraphs which follow summarize this letter, which is available for review in the project case file at the Department of City Planning, 450 McAllister Street, San Francisco.



- /9/ This information is from Nishita and Carter, Inc., Site Reconnaissance and Landscape Plan, March 1, 1991, provided by the project architect, William Turnbull Associates. A copy of these drawings are available for review in the project case file at the Department of City Planning, 450 McAllister Street, San Francisco.
  - /10/ San Francisco Datum establishes the City's "0" point for surveying purposes at approximately 8.6 feet above mean sea level.
  - /11/ Harding Lawson Associates, San Francisco, Phase I Report, Geotechnical Investigation, Conceptual Plan, Grace Cathedral prepared for Grace Cathedral, October 1986, p. 4. A copy of this report is available in the project case file at the Department of City Planning, 450 McAllister St.
  - /12/ Ibid. p. 5.
  - /13/ Paul Lobush, William Turnbull Associates, letter, August, 14, 1991.
  - /14/ Dames and Moore, pp. 6-8.
  - /15/ URS/John A. Blume and Associates, "San Francisco Seismic Safety Investigation," 1974. Groundshaking intensities that would result from a major earthquake were projected and classified on a five-point scale ranging from E (Weak) through A (Very Violent).
  - /16/ Harding Lawson Associates, p. 7.
  - /17/ Existing energy use is based on PG&E customer bills for the Cathedral and School during 1989. Calculations and analysis for this section were completed by Environmental Science Associates, Inc. Letters on this subject, dated November 12, 1991; December 16, 1991; and December 23, 1991, Jeff Wehling, to Hillary Gitelman, are available for review in the project case file, at the Department of City Planning, 450 McAllister Street, San Francisco.
- The British thermal unit (Btu) is the quantity of heat required to raise the temperature of one pound of water one degree Fahrenheit at sea level. The term "at source" means that adjustments have been made in the calculation of the thermal energy equivalent (Btu) for losses in energy that occur during generation, transmission, and distribution of the various energy forms as specified in ERCDC, 1977 Energy Conservation Design Manual for New Non-Residential Buildings, Energy Conservation and Development Commission, Sacramento, California, and Apostolos, J.A., W.R. Shoemaker, and E.C. Shirley, 1978 Energy and Transportation System, California Department of Transportation, Sacramento, California, Project #20-7, Task 8.
- /18/ B. Hannon, et al., 1978, "Energy and Labor in the Construction Sector," Science 202:837-47.
  - /19/ PG&E Company, 1989 Annual Report. (Cited by Environmental Science Associates in a letter dated December 23, 1991. This letter is available for review in the project case file at the Department of City Planning, 450 McAllister Street, San Francisco.)
  - /20/ Ibid.



C. OTHER

YES NO DISCUSSE

Require approval and/or permits from City Departments other than Department of City Planning or Bureau of Building Inspection, or from Regional, State or Federal Agencies?

— X —

D. MITIGATION MEASURES

YES NO N/A DISCUSS

1) Could the project have significant effects if mitigation measures are not included in the project?

X — — X

2) Are all mitigation measures necessary to eliminate significant effects included in the project?

X — — X

The following mitigation measure is related to a topic determined to require no further analysis in the EIR. The EIR will contain a mitigation chapter describing this measure and also including other measures which would be, or could be, adopted to reduce potential adverse effects of the project identified in the EIR. The project sponsor has agreed to implement the following:

Construction Air Quality:

The project sponsor would require the contractor(s) to sprinkle the site with water during demolition, excavation, and construction activities; sprinkle unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soils, sand or other such material; and sweep surrounding streets during demolition, excavation, and construction at least once per day to reduce particulate emissions. The project sponsor would require that the contractor(s) obtain reclaimed water from the Clean Water Program for this purpose. The project sponsors would require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means: a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

E. ALTERNATIVES

Alternatives to the proposed project include the following:

1. No project: the site would remain in its existing condition.

2. Retention of Site Structures:

2(a) Crocker Fence, Retention in Place

The Crocker Fence would remain at its current location. The staircase and parking structure would be redesigned to accommodate the Fence. Other elements of the project would remain as proposed.

2(b) Retention of Cathedral House and Crocker Fence

The Fence and the Cathedral House would remain at their current locations.

The parking structure, Chapter House, landscaped plaza, and school addition would be redesigned or remain as proposed.

These alternatives and their potential impacts will be discussed in the EIR.

F. MANDATORY FINDINGS OF SIGNIFICANCE

YES NO DISCUSSED

- \*1) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or pre-history? X
- \*2) Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?    X
- \*3) Does the project have possible environmental effects which are individually limited, but cumulatively considerable? (Analyze in the light of past projects, other current projects, and probable future projects.)    X
- \*4) Would the project cause substantial adverse effects on human beings, either directly or indirectly?    X

G. ON THE BASIS OF THIS INITIAL STUDY

- I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Department of City Planning.
- I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because the mitigation measures, numbers       , in the discussion have been included as part of the proposed project. A NEGATIVE DECLARATION will be prepared.
- X I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

*Barbara W. Sahm*

BARBARA W. SAHM  
Environmental Review Officer  
for

DEAN L. MACRIS  
Director of Planning

Date: 1/5/91

## APPENDIX B: ARCHITECTURAL RESOURCES

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The architectural ratings discussed in the text of this report include the results of two separate architectural evaluation surveys: the 1976 San Francisco Department of City Planning Citywide Architectural Survey, and the Heritage Survey. These are discussed below.

### SAN FRANCISCO DEPARTMENT OF CITY PLANNING CITYWIDE ARCHITECTURAL SURVEY

Between 1974 and 1976, the San Francisco Department of City Planning conducted a citywide inventory of architecturally significant buildings. An advisory review committee of architects and architectural historians assisted in the final determination of ratings for the 10,000 buildings, the results of which were entered in an unpublished 60-volume record of the inventory. The rated buildings are also represented on a set of color-coded maps which identify the location and relative significance of each building surveyed. The inventory and maps are on file at the Department of City Planning.

The inventory assessed the architectural significance of the surveyed structures from the standpoint of overall design and particular design features. Both contemporary and older buildings were included, but historical associations were not considered. Each building was given two numerical ratings, one for architectural quality and one for overall architectural significance, urban design context, and environment significance. The latter rating is referred to in this report. The ratings ranged from a low of "0" to a high of "5." The architectural survey resulted in a listing of the best ten percent of San Francisco's buildings. In the estimation of the inventory participants, buildings rated "3" or higher represent approximately the best two percent of the City's architecture.

### HERITAGE SURVEY

The Foundation for San Francisco's Architectural Heritage, through its consultants, Charles Hall Page & Associates, Inc., conducted an architectural and historical survey of all downtown structures. In 1979, the original inventory results were published in the book *Splendid Survivors* (Foundation for San Francisco's Architectural Heritage, *Splendid Survivors*, California Living Books, San Francisco 1979). A subsequent 1982 Heritage survey evaluated all structures in the



C-3 zoning districts in areas not covered in the *Splendid Survivors* survey ("San Francisco Downtown Architectural Survey: C-3 Zoning District, Final Evaluated List," December 1, 1982). The expanded inventory has not been formally published by Heritage. Criteria considered in rating the buildings for both surveys include Architectural Significance, Historic Context and Negative Alterations. Summary ratings from "A" to "D" were assigned to each building on the basis of these scores. The summary ratings, as described on pp. 12-13 of *Splendid Survivors*, are listed below:

- A. Highest Importance. Individually the most important buildings in downtown San Francisco, distinguished by outstanding qualities of architecture, historical values, and relationship to the environment. All A-group buildings are eligible for the National Register, and of highest priority for City Landmark status.
- B. Major Importance. Buildings which are of individual importance by virtue of architectural, historical, and environmental criteria. These buildings tend to stand out for their overall quality rather than for any particular outstanding characteristics. B-group buildings are eligible for the National Register, and of secondary priority for City Landmark status.

The Landmarks Preservation Advisory Board does not distinguish between "A" rated and "B" rated buildings for purposes of preservation.

- C. Contextual Importance. Buildings which are distinguished by their scale, materials, compositional treatment, cornice and other features. They provide the setting for more important buildings and they add visual richness and character to the downtown area. Many C-group buildings may be eligible for the National Register as part of historic districts.
- D. Minor or No Importance. Buildings which are insignificant examples of architecture by virtue of original design, or more frequently, insensitive remodeling. This category includes vacant buildings and parking lots. Most D-group buildings are sites of opportunity.

Not Rated. Buildings which have been built or suffered insensitive exterior remodelings since 1945.

## **XI. EIR AUTHORS AND CONSULTANTS; ORGANIZATIONS AND PERSONS CONSULTED**

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### **EIR AUTHORS**

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